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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:	Chapter 11
CBRM REALTY INC., et al.,	Case No. 25-15343 (MBK)
Debtors.	(Jointly Administered)
	Hearing Date: [To be set by the Court]
	Response Deadline: [To be set by the Court]

MOTION OF THE CREDITOR RECOVERY TRUSTEE FOR ENTRY OF AN ORDER (I) COMPELLING MIRIAM MIZRACHI TO COMPLY WITH THE ORDER ENTERED OCTOBER 21, 2026 [DOC. NO. 892], (II) AWARDING FEES AND COSTS AGAINST MS. MIZRACHI AND HER COUNSEL, OKIN HOLLANDER LLC, AND (III) GRANTING RELATED RELIEF

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TO: THE HONORABLE MICHAEL B. KAPLAN
UNITED STATES BANKRUPTCY JUDGE

RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC (the "**Trustee**"), by and through its undersigned counsel, hereby moves (the "**Motion**") for entry of an order, substantially in the form annexed hereto as **Exhibit A** (the "**Proposed Order**"), (i) compelling Miriam Mizrachi (a/k/a Miriam Silber, a/k/a Miriam Mizrahi) ("**Ms. Mizrachi**") to comply with the *Order (I) Compelling Miriam Mizrachi to Comply with the Rule 2004 Subpoena Issued to Her, as Modified, (II) Denying in Part Her Motion to Quash the Subpoena, (III) Overruling in Part Her Objections Thereto, and (IV) Granting Related Relief*, entered October 21, 2026 [Doc. No. 892] (the "**Order**"); (ii) awarding the Trustee the fees and costs incurred as a result of the non-compliance, against Ms. Mizrachi and her counsel, Okin Hollander LLC ("**Okin Hollander**"), jointly and severally; and (iii) granting related relief. The Trustee has filed herewith an application to hear the Motion on shortened notice. In support of the Motion, the Trustee relies on the Declaration of Richard J. Corbi, Esq. filed herewith (the "**Corbi Declaration**" or "**Corbi Decl.**") and respectfully states as follows:

PRELIMINARY STATEMENT

The Court has already ruled. On October 21, 2026, it ordered Ms. Mizrachi, on or before November 20, 2026, to "comply with the Subpoena in all respects and produce all responsive, non-privileged documents." Order ¶ 4. It overruled the objections in her Motion to Quash and Opposition, subject to the terms of the Order, and gave her one further opportunity to object: "in detailed and specific form," with any claim of privilege asserted on a log, "[t]ogether with or prior to compliance." *Id.* ¶¶ 2, 7. Because the Trustee already held a copy of what she had produced in the Acquiom proceedings, the Order also excused her from re-producing those documents and required, in their place, a written certification of whether that set was complete. *Id.* ¶ 4.

On November 20, 2026, Ms. Mizrachi delivered two things. The first is the production she made in the Acquiom proceeding nineteen months ago, down to her signed written response to that party's requests, captioned in the New York action and addressed to that party's counsel. The Trustee has found no document in it dated after April 28, 2025. The second is a forty-eight-page set of objections and responses signed by her counsel. It does not produce anything. It announces that no electronically stored information "will be identified, collected, searched, reviewed or produced" until an ESI protocol and a Rule 502(d) order are agreed or entered even though counsel never sought to meet and confer prior to November 20, and it defers on that basis the production of every category of document the Subpoena seeks, including paper records she says she has already located. It re-asserts objections this Court overruled: to the 2018 start of the Relevant Time Period, to the Subpoena's definitions, and to burden and cost. It announces that she will withhold communications with Mr. Silber as marital communications under a categorical log the Order does not provide for. There is no certification under paragraph 4, and no privilege log.

In short, Ms. Mizrachi has answered an order compelling production by a date certain by producing nothing new and fixing a new precondition of her own. The Order's deadline could be extended only by the Trustee's consent or by the Court. Order ¶ 4. Neither has occurred, and she did not ask. This is the course she followed in the Acquiom proceedings. There, she ignored a subpoena served in December 2024 until the judgment creditor moved, three months later, by order to show cause to hold her in contempt. She retained counsel the week before the hearing, heard the court state that from its perspective she was in contempt, and then stipulated to produce everything in her possession, custody or control without interposing "any defense or objection (except privilege, if applicable)." A second subpoena that summer required a second contempt application, which was pending when Mr. Silber's bankruptcy filing stayed the action. In this case

she moved to quash rather than produce, was compelled by this Court, and has now answered the Court's Order with the Acquiom file and a new set of conditions.

The Order is specific, and Ms. Mizrachi and her counsel knew its terms: her counsel wrote to the Trustee under it a week after entry, and asked for the Trustee's Bates index precisely so that the Acquiom documents would not be re-produced. The Order was not obeyed. The objections the Court overruled are not revived by restating them, and an ESI protocol is not a condition the Order imposes. Ms. Mizrachi may withhold a responsive document on a claim of privilege asserted on a log in the form paragraph 7 requires; she may not otherwise withhold discovery. The Trustee asks the Court to enforce its Order: to direct compliance within seven days, to strike the overruled objections and the preconditions, and to award the Trustee its fees and costs against Ms. Mizrachi and against Okin Hollander, which paragraph 7 of the Order charged directly with asserting her objections and which signed the conditions on which production has been withheld. The Trustee does not seek civil contempt sanctions by this Motion, but reserves the right to do so.

JURISDICTION AND VENUE

1. The Court has jurisdiction over this Motion under 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference to the Bankruptcy Court Under Title 11 of the United States District Court for the District of New Jersey. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A). Venue is proper under 28 U.S.C. §§ 1408 and 1409. The Court expressly retained jurisdiction over "all matters arising from or related to the implementation, interpretation and enforcement of" the Order. Order ¶ 12.

2. The statutory and rule-based predicates for the relief requested are section 105(a) of title 11 of the United States Code (the "**Bankruptcy Code**"); Rules 2004, 9014 and 9016 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"); Rules 37(b)(2) and 45 of the

Federal Rules of Civil Procedure, made applicable by Bankruptcy Rules 7037, 9014(c) and 9016; and paragraphs 10 and 12 of the Order.

BACKGROUND

A. The Subpoena and the Motion Practice

3. On August 20, 2026, the Trustee issued a Rule 2004 subpoena to Ms. Mizrachi (the "**Subpoena**") commanding the production of documents in twenty-three categories for a "RELEVANT TIME PERIOD" of "January 1, 2018 through the present." Subpoena, Ex. A, Definition 18. The Subpoena is of record at Doc. No. **[858]**, Ex. A. The Subpoena requires that any document withheld on a claim of privilege be logged (Instructions 7, 8 and 15), and that where Ms. Mizrachi has no documents responsive to a request she "state that expressly and describe the search performed, identifying the accounts, devices and locations searched and the person who conducted the search" (Instruction 16; *see also* Instruction 9).

4. Ms. Mizrachi did not produce. On September 3, 2026, she moved to quash the Subpoena in Mr. Silber's chapter 7 case, Case No. 25-21650 (MBK) [Doc. No. 198], and refiled that motion in these cases [Doc. No. 861] (together, the "**Motion to Quash**"). The Trustee moved to compel on September 16, 2026 [Doc. No. 857] (the "**Motion to Compel**"). Ms. Mizrachi opposed [Doc. No. 879] (the "**Opposition**"), the Trustee replied [Doc. No. 881], the Court heard both motions on October 15, 2026, and Ms. Mizrachi filed supplemental reply papers on October 20, 2026 [Doc. No. 890]. Her objections were presented in three sets of papers and argued at a hearing.

B. The Order

5. On October 21, 2026, the Court entered the Order. The Order denied the Motion to Quash in part and overruled the objections asserted in the Motion to Quash and the Opposition,

subject to the resolution set forth in the Order, while preserving claims of attorney-client privilege and work-product protection, "which shall be asserted in accordance with paragraph 7." Order ¶ 2. It modified the Subpoena so that the Order's compliance dates replaced the Subpoena's return date. *Id.* ¶ 3.

6. Paragraph 4 of the Order provides:

> On or before November 20, 2026, unless the time period is extended consensually by the Trustee or by the Court, Ms. Mizrachi shall comply with the Subpoena in all respects and produce all responsive, non-privileged documents, including all such documents that she collected, reviewed or produced in *Acquiom Agency Services LLC v. Silber*, Index No. 654386/2024 (Sup. Ct. N.Y. Cnty.); provided, however, that if the Trustee has furnished a Bates index of the production from that proceeding in its possession, Ms. Mizrachi need not re-produce the documents listed on that index and shall instead certify in writing whether the documents identified on that index constitute her complete responsive production in that proceeding, including any supplements, and shall identify and produce any responsive materials omitted from it.

Order ¶ 4. Paragraph 7 provides:

> Together with or prior to compliance with the Subpoena, counsel to Ms. Mizrachi shall assert, in detailed and specific form, any objection to production, along with any applicable claim of privilege or work-product protection by means of a log served with the production to which it relates, identifying each withheld document by date, author, recipients, general subject matter and the basis for the claim.

Id. ¶ 7.

7. Paragraph 5 required counsel to Ms. Mizrachi to advise the Trustee within seven days whether Berkovitch & Bouskila, PLLC, or any other counsel, continued to hold her file from the Acquiom proceedings. Paragraph 6 required the Trustee, within the same period, to furnish copies of its third-party subpoenas. Paragraph 10 expressly reserves "[a]ll parties' rights under Fed. R. Civ. P. 45(g), Bankruptcy Rules 2004 and 9016, and section 105(a) of the Bankruptcy Code, including the right to seek fees, costs and further relief in the event of non-compliance with

this Order." Paragraph 12 retains jurisdiction over enforcement. Paragraph 13 schedules a discovery conference for December 7, 2026 and reminds the parties of their obligation to meet and confer on ongoing discovery disputes and issues, including ESI protocols, additional confidentiality and protective orders, and requests for a Rule 502(d) order.

8. No party appealed the Order or sought its reconsideration. Ms. Mizrachi did not ask the Trustee or the Court to extend the November 20, 2026 deadline, and made no request under Rule 45(d)(2)(B)(ii) for protection from significant expense. Corbi Decl. ¶ 16.

C. The Exchanges Under Paragraphs 4 Through 6

9. On October 28, 2026, Okin Hollander wrote "[i]n accordance with paragraph 5" of the Order that Berkovitch & Bouskila, PLLC had retained its file of the documents Ms. Mizrachi produced in the Acquiom proceedings. "[I]n furtherance of the provisions of paragraph 4," it asked whether the Trustee had a Bates-stamped index of that production "so that at the appropriate time, we do not re-produce the documents listed on that index." Corbi Decl. Ex. A.

10. The Trustee answered the same day. It furnished a Bates index of the copy of Ms. Mizrachi's Acquiom production in its possession, Bates-stamped MM000001 through MM000157, for purposes of paragraph 4. It explained that Ms. Mizrachi therefore need not re-produce those documents, but was instead to certify by November 20, 2026 whether they constituted her complete responsive production in that proceeding. It asked that the certification address any production made after April 28, 2025, any documents produced in connection with her testimony, and any responsive documents collected or reviewed but not produced. And it identified two items that were incomplete on the face of the Trustee's copy: the 2021 tax returns referred to in her response to Request No. 2 in that proceeding, and a missing page of a Northeast

Community Bank statement. Corbi Decl. Ex. B. The Trustee also furnished, under paragraph 6, copies of the third-party subpoenas the Order described. *Id.* Ex. C.

D. The November 20, 2026 Production

11. On November 20, 2026, Okin Hollander wrote to the Trustee's counsel enclosing Ms. Mizrachi's "Objections and Responses to Subpoena for Rule 2004 Examination" (the "**Objections and Responses**") and a link to "all of the documents provided to us by Berkovitch & Bouskila, PLLC," stating that "[i]t is our understanding that the link represents all documents which Ms. Mizrachi, through her counsel in that matter, produced as a nonparty in that proceeding." Corbi Decl. Exs. D, E. The letter proposed a meet and confer on November 24, 2026. *Id.* Ex. D.

12. The documents. The linked production consists of two folders, titled "Production Part 2" and "Responsive docs," the second containing a subfolder titled "documents related to debt." Corbi Decl. ¶ 12 & Ex. F. None of the documents bears a Bates number. *Id.* ¶ 12. It is the Acquiom production. The folder "Production Part 2" contains Ms. Mizrachi's written "Response to Document Requests," captioned in *Acquiom Agency Services LLC v. Moshe Silber*, Index No. 654386/2024, responding to the judgment creditor's subpoena, signed by her, dated April 28, 2025 and addressed to the judgment creditor's counsel. *Id.* ¶ 12 & Ex. G. The balance consists of documents dated or created on or before that date: a 2021 joint income tax return and its e-file authorizations; a balance sheet and personal financial statement as of March 31, 2022; an organizational chart; operating agreements and amendments; a closing binder; insurance materials; a recorded deed; a single mortgage-loan statement; a storage-facility record; and more than one hundred copies of pleadings, exhibits and judgments filed in collection and foreclosure actions. *Id.* ¶¶ 12, 14. The Trustee has identified no document in the production dated after April 28, 2025. *Id.*

¶ 14. It does include the complete 2021 joint return, one of the two items the Trustee identified on October 28 as missing from its copy. *Id.* ¶ 15.

13. No certification. Neither the letter nor the Objections and Responses contains the certification paragraph 4 requires. Ms. Mizrachi did not certify, in writing, whether the documents on the Trustee's Bates index constitute her complete responsive production in the Acquiom proceedings, including any supplements, or identify anything omitted from it. Counsel's statement of its "understanding" of what prior counsel's link represents does not address the index, the two gaps the Trustee identified, any production after April 28, 2025, or documents collected or reviewed but not produced. Corbi Decl. ¶ 13 & Exs. B, D.

14. The Objections and Responses. The Objections and Responses produce nothing and commit to produce nothing by any date. Their operative terms are these:

(a) *Production of ESI is conditioned on future orders.* "No ESI will be identified, collected, searched, reviewed or produced unless and until an appropriate ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court." Obj. & Resp. at 6 (General Objection 1); *see id.* at 6 (General Objection 2), 9 (General Objection 9). Nearly every specific response repeats that condition. *E.g.*, *id.* at 16, 18, 25, 28, 30, 39, 40, 42.

(b) *Paper records are deferred as well.* As to real property, Ms. Mizrachi states that she "has identified certain records," and that she will produce them "after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court." *Id.* at 26 (Request No. 9).

(c) *Institutional records are refused.* Ms. Mizrachi "does not propose to collect, review or reproduce account statements, deposit records, cancelled checks, wire-transfer

records or other institutional transaction data" that the Trustee has obtained or can obtain by subpoena, and asks that the Court direct the Trustee to give her copies of its third-party productions. *Id.* at 5; *see id.* at 7 (General Objections 3–5).

(d) *Overruled objections are re-asserted.* The Objections and Responses object to the Relevant Time Period beginning January 1, 2018 and propose to substitute May 27, 2022 through May 19, 2025 (*id.* at 11–13); object to the definitions of "YOU," "POSSESSION, CUSTODY OR CONTROL" and "SUBJECT ENTITIES" (*id.* at 10–11); object to Requests 7, 12, 13, 14 and 22 as overbroad and, for most of them, disproportionate and unduly burdensome; and "expressly preserve[]" cost-shifting without making the supported showing paragraph 4 of the Order requires (*id.* at 8–9). Each of these was raised in the Motion to Quash or the Opposition. *See* Motion to Quash ¶¶ 44, 51(iv); Opposition ¶ 9.

(e) *Privilege by category.* Ms. Mizrachi states that she "will withhold qualifying confidential marital communications" with Mr. Silber, and that she reserves the right to propose a "categorical logging procedure" because "a document-by-document log would impose a disproportionate burden." Obj. & Resp. at 38 (Request No. 17); *see id.* at 6, 14. No log of any kind was served.

(f) *Partial answers.* Request 20 calls for documents concerning "any safe deposit box, storage unit or similar facility." The response states only that Ms. Mizrachi "had no safety deposit boxes," although her own production includes a storage-facility record. *Id.* at 41; Corbi Decl. ¶ 12.

15. Discovery concerning the Sunnyside/Vecta Entities. The Objections and Responses also reserve Ms. Mizrachi's right to argue that discovery concerning Vecta and Sunnyside should

proceed in the Chapter 7 Trustee's adversary proceedings rather than under the Subpoena. Obj. & Resp. at 17–18, 20. In its order of November 13, 2026 on the Levon Capital subpoenas, the Court carved out of those subpoenas any document concerning Vecta Partners LLC, Vecta Inc., Vecta Capital LLC, Sunnyside Bancorp, Inc. or Sunnyside Federal Savings and Loan Association of Irvington (the "**Sunnyside/Vecta Entities**"), or any actual, proposed or abandoned acquisition of, investment in or change in control of a bank or other depository institution, without prejudice to seeking that discovery at or after the December 7, 2026 conference, in any adversary proceeding, or otherwise by further order. Doc. No. 907 ¶ 3. Consistent with that order, the Trustee has advised Ms. Mizrachi that it will pursue discovery from her concerning the Sunnyside/Vecta Entities in the adversary proceeding it anticipates commencing, without prejudice to its rights under the Subpoena and the Order, and it does not seek that discovery by this Motion. Corbi Decl. Ex. H. Everything else the Subpoena calls for remains due under the Order.

E. The Trustee's Demand

16. On November 21, 2026, the Trustee wrote to Okin Hollander identifying these deficiencies, agreeing to meet and confer on November 24, 2026 (which the Trustee agreed to meet), and demanding compliance with paragraphs 4 and 7 of the Order by 5:00 p.m. (Eastern Time) on November 23, 2026, failing which the Trustee would move, on shortened notice, to compel compliance with the Order and for fees and costs against Ms. Mizrachi and Okin Hollander. Corbi Decl. ¶ 17 & Ex. H. Ms. Mizrachi did not comply by the 5:00 p.m. (Eastern Time) November 23, 2026 deadline.

F. The Acquiom Proceedings

17. Ms. Mizrachi's conduct here repeats her conduct in *Acquiom Agency Services LLC v. Silber*, Index No. 654386/2024 (Sup. Ct. N.Y. Cnty.) (the "**Acquiom proceedings**"), which the

Motion to Compel described (¶¶ 45–47) and which the exhibits to the declaration filed with it document. See Doc. No. **[858]**, Exs. K–O. The sequence was as follows.

(a) *December 26, 2024.* Spano Investor LLC ("**Spano**"), assignee of the $22,153,919.59 judgment entered against Mr. Silber on December 11, 2024, served Ms. Mizrachi with a subpoena duces tecum and restraining notice. She neither produced nor objected, did not appear for the deposition noticed for January 29, 2025, and did not answer a letter from Spano's counsel of February 4, 2025. NYSCEF Doc. Nos. 55, 57; Motion to Compel ¶¶ 45–46.

(b) *March 21, 2025.* Spano moved by order to show cause to hold her in contempt. NYSCEF Doc. Nos. 53–58 (Mot. Seq. No. 003).

(c) *April 3, 2025.* At the hearing, counsel retained "late last week" told the court that he could not yet waive her objections. The court responded that engaging counsel at the last minute, after a contempt application, did not relieve her of complying with the subpoena served in December 2024, and stated: "So, for this, from this Court's perspective, certainly she's in contempt." NYSCEF Doc. No. 64 at 2:18–19, 4:7–13. When counsel offered, as an example of an objection, that the documents might be obtained from the judgment debtor, the court answered, "That's not a basis," and Spano's counsel observed that "[t]he time for that has long passed." *Id.* at 4:20–5:9.

(d) *April 7–9, 2025.* Ms. Mizrachi stipulated that she "shall search for, obtain, and produce all documents in her possession, custody or control demanded in the subpoena duces tecum on or before April 28, 2025, and shall not interpose any defense or objection (except privilege, if applicable)," and that the contempt motion

would be withdrawn "upon Mizrachi's full compliance." NYSCEF Doc. No. 62. On April 9, 2025, in lieu of adjourning the motion, the court denied it without prejudice to refile. NYSCEF Doc. No. 63.

(e) *April 28, 2025.* Ms. Mizrachi served her written response, which is the same document she delivered to the Trustee on November 20, 2026. Notwithstanding the stipulation, it opens with "General Objections," including that documents are in the custody and control of persons over whom she has no control, and reserves the right to supplement. Corbi Decl. Ex. G. She was deposed on May 8, 2025.

(f) *July 12, 2025.* Spano served a second subpoena duces tecum, returnable August 3, 2025, and again moved to hold her in contempt (Mot. Seq. No. 004). NYSCEF Doc. Nos. 70, 107.

(g) *September 25, 2025.* Following Mr. Silber's chapter 7 petition of September 19, 2025, the court stayed the action and denied the second contempt motion "without prejudice to renew upon lifting of the stay." NYSCEF Doc. No. 107.

18. Ms. Mizrachi has not been adjudged in contempt in the Acquiom proceedings. But the record of both proceedings is consistent: she has produced only after a contempt application or a court order, and what she has produced, in each, is the same April 2025 set. Here, as there, her answer to a direct command is a set of objections the court has already rejected.

RELIEF REQUESTED

19. By this Motion, the Trustee requests entry of the Proposed Order: (i) compelling Ms. Mizrachi, within seven (7) days after its entry, to (a) serve the certification required by paragraph 4 of the Order, signed by her under penalty of perjury; (b) produce all remaining responsive, non-privileged documents in her possession, custody or control, other than documents

concerning the Sunnyside/Vecta Entities, including documents held on her behalf by Berkovitch & Bouskila, PLLC, her accountants or any other agent (Subpoena Instr. 14); (c) serve a written response to each request in the Subpoena, stating whether responsive documents exist and whether any are being withheld, together with a description of the search performed, signed by her under penalty of perjury (Subpoena Instrs. 9, 16); and (d) serve a log, in the form paragraph 7 requires, of every document withheld on a claim of privilege or work-product protection; (ii) overruling the objections in the Objections and Responses, other than claims of privilege asserted on such a log, and striking the ESI-protocol and Rule 502(d) preconditions; (iii) awarding the Trustee the reasonable fees and costs incurred in securing compliance with the Order, against Ms. Mizrachi and Okin Hollander, jointly and severally; and (iv) granting related relief.

BASIS FOR RELIEF

I. THE COURT SHOULD ENFORCE THE ORDER

20. A bankruptcy court "plainly ha[s] jurisdiction to interpret and enforce its own prior orders." *Travelers Indem. Co. v. Bailey*, 557 U.S. 137, 151 (2009). Section 105(a) of the Bankruptcy Code authorizes the Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." The Order itself retains jurisdiction over its enforcement and reserves the Trustee's right to seek "fees, costs and further relief in the event of non-compliance." Order ¶¶ 10, 12.

21. Ms. Mizrachi knew the Order's terms. She was a movant in the contested matter it resolved, and her counsel acted under it within a week of its entry: on October 28, 2026, Okin Hollander wrote "[i]n accordance with paragraph 5" of the Order and, "[i]n furtherance of the provisions of paragraph 4," asked for the Trustee's Bates index "so that at the appropriate time, we do not re-produce the documents listed on that index." Corbi Decl. Ex. A. The Trustee furnished

the index the same day and set out in writing what paragraph 4 required in place of re-production. *Id.* Ex. B.

22. The Order was not complied with in at least four respects.

(a) *No certification.* Having asked for and received the Bates index, Ms. Mizrachi did not certify whether the indexed documents constitute her complete responsive production in the Acquiom proceedings, and did not identify anything omitted from it. Order ¶ 4. She re-produced the indexed documents instead, which paragraph 4 made unnecessary, and omitted the certification, which it required. Counsel's statement of its "understanding" of what prior counsel's link represents is not a certification by Ms. Mizrachi and does not address the index.

(b) *No production.* Paragraph 4 required Ms. Mizrachi to "comply with the Subpoena in all respects and produce all responsive, non-privileged documents" by November 20, 2026. Apart from the Acquiom file, she produced nothing. The Acquiom file answered a different subpoena, served by a different party, with different requests, and contains nothing the Trustee has found dated after April 28, 2025, although the Subpoena reaches to the present. Everything else is deferred, by the Objections and Responses, to an indefinite date after an ESI protocol and a Rule 502(d) order are agreed or entered. The deferral reaches paper records she says she has already identified. *See* ¶ 14(a)–(b), *supra*.

(c) *Overruled objections re-asserted in place of compliance.* Paragraph 2 overruled the objections in the Motion to Quash and the Opposition. Paragraph 7 permitted objections to be asserted "[t]ogether with or prior to compliance," not instead of it, and "in detailed and specific form." The Objections and Responses re-assert the

overruled objections (the time period, the definitions, burden and cost) and add generic ones that withhold whole categories, such as institutional records, without identifying a single withheld document. *See* ¶ 14(c)–(d), *supra*. Restating an objection the Court overruled does not make it a paragraph 7 objection.

(d) *No log.* Paragraph 7 requires that any claim of privilege be asserted "by means of a log served with the production to which it relates, identifying each withheld document by date, author, recipients, general subject matter and the basis for the claim." Ms. Mizrachi has announced that she will withhold communications with Mr. Silber as marital communications and that a document-by-document log is too burdensome. The Order fixed the form of the log, and she did not seek to modify it. *See* ¶ 14(e), *supra*.

II. NOTHING IN THE ORDER SUSPENDED THE NOVEMBER 20 DEADLINE

23. Ms. Mizrachi will say that paragraph 13 of the Order contemplates an ESI protocol and a Rule 502(d) order, and that she may therefore await them. The Order does not support that reading. Paragraph 4 sets the deadline, and provides the only ways to move it: "unless the time period is extended consensually by the Trustee or by the Court." Paragraph 13 schedules a discovery conference for December 7, 2026 and "remind[s]" the parties of their obligation to meet and confer on "ongoing discovery disputes and issues, including agreements on ESI protocols, additional confidentiality and protective orders, and requests for a Rule 502(d) order." It does not condition paragraph 4 on any of those things, defer the November 20 deadline to the conference, or reopen objections the Order overruled. Had the Court meant production to await a protocol, it would not have fixed a production date more than two weeks before the conference.

24. The Court's order on the Levon Capital subpoenas, entered three weeks after the Order, confirms the point. There the Court provided that "[t]o the extent a detailed Objection to a specific request is received, the deadline for production of that specific request will be stayed pending further order of the Court," and required that any objection be "narrowly tailored to each specific request." Doc. No. 907 ¶¶ 6, 8. The Order contains no such provision. When the Court intended an objection to suspend a production deadline, it said so. And even under the Levon order, a detailed objection stays production only of "that specific request"; it does not authorize a single precondition applied across every request.

25. Nor does the stated rationale fit what was withheld. A Rule 502(d) order protects against waiver of privilege by disclosure; it is no reason to withhold non-privileged documents, and the Protective Order already governs confidentiality. Order ¶ 9; Doc. No. 791. An ESI protocol governs the collection of electronic data; it is no reason to withhold paper records already located, tax schedules she agrees she will produce, or the certification paragraph 4 requires. If Ms. Mizrachi believed she needed relief from the Order's deadline, the Order told her where to get it: from the Trustee or from the Court. She sought it from neither. A party may not grant herself an extension by announcing conditions on the day compliance is due.

26. Ms. Mizrachi's objections have been heard and overruled. She presented them in the Motion to Quash, in the Opposition and in supplemental papers filed the day before the Order was entered, and argued them on October 15, 2026. The time to object has passed. What remains open to her is a claim of attorney-client privilege, work-product protection or another privilege, asserted on a log in the form paragraph 7 requires. She may not otherwise withhold discovery.

III. THE COURT SHOULD AWARD FEES AND COSTS AGAINST MS. MIZRACHI AND OKIN HOLLANDER

27. Bankruptcy Rule 9014(c) makes Bankruptcy Rule 7037, and through it Rule 37(b)(2), applicable in contested matters. Where a party fails to obey an order to provide discovery, Rule 37(b)(2)(C) provides that the court "must order the disobedient party, the attorney advising that party, or both to pay the reasonable expenses, including attorney's fees, caused by the failure, unless the failure was substantially justified or other circumstances make an award of expenses unjust." Ms. Mizrachi is a party to this contested matter: she brought the Motion to Quash, and the Order resolved her motion together with the Trustee's. No justification for the failure has been offered, and none appears from the record. The Order also expressly preserves "the right to seek fees, costs and further relief in the event of non-compliance." Order ¶ 10.

28. The award should run against Okin Hollander as well as Ms. Mizrachi. The Order imposed the relevant obligations on counsel directly. Paragraph 7 provides that "counsel to Ms. Mizrachi shall assert, in detailed and specific form, any objection to production, along with any applicable claim of privilege or work-product protection by means of a log served with the production to which it relates." Order ¶ 7. Paragraph 5 likewise ran to counsel. Okin Hollander knew those terms: it invoked paragraphs 4 and 5 by number on October 28, 2026, and asked for the Bates index for the stated purpose of not re-producing the indexed documents. On November 20 it transmitted a production that re-produced those documents without the certification paragraph 4 required in their place. And it signed the Objections and Responses, which re-assert objections the Court overruled, condition all further production on an ESI protocol and a Rule 502(d) order, and announce a categorical approach to privilege that paragraph 7 does not permit. Corbi Decl. Exs. A, D, E. The conditions on which production has been withheld are counsel's.

29. The Trustee asks that it be permitted to file, within fourteen (14) days after entry of the Proposed Order, a certification of the fees and costs it has incurred from November 20, 2026 through compliance in securing compliance with the Order, including the November 21, 2026 demand, this Motion and the hearing on it, with any objection due seven (7) days after the certification is filed.

IV. RESERVATION OF RIGHTS

30. Section 105(a) of the Bankruptcy Code also vests the Court with authority to impose civil contempt sanctions to enforce its orders. *See Taggart v. Lorenzen*, 587 U.S. 554 (2019). While civil contempt sanctions are not sought by this Motion, the Trustee reserves all rights to seek them, including coercive sanctions, and any other remedy available, if Ms. Mizrachi does not comply with the Order as enforced. The history of the Acquiom proceedings, in which compliance followed only a contempt application, bears on that question. *See* ¶ 17, *supra*.

EFFORTS TO RESOLVE WITHOUT THE COURT'S INTERVENTION

31. Consistent with paragraph 13 of the Order, the Trustee sought to resolve this without motion practice, by its letters of October 28, 2026 setting out what paragraph 4 required, by its demand of November 21, 2026, and by meeting and conferring with Okin Hollander on November 24, 2026, as Okin Hollander proposed. Corbi Decl. ¶ 17, Exs. B, D, H.

NOTICE

32. Notice of this Motion will be given as directed in the order shortening time, including to Ms. Mizrachi, through Okin Hollander and by overnight delivery to her; to Okin Hollander; to the Office of the United States Trustee; to Karen E. Bezner, as chapter 7 trustee of the estate of Moshe Silber, and her counsel; to counsel to Mr. Silber; and to all parties that have

requested notice under Bankruptcy Rule 2002. The Trustee submits that no other or further notice is required.

NO PRIOR REQUEST

33. Other than the Motion to Compel, which resulted in the Order, no prior request for the relief sought in this Motion has been made to this or any other court.

CONCLUSION

WHEREFORE, the Trustee respectfully requests that the Court enter the Proposed Order, substantially in the form annexed hereto as Exhibit A, and grant such other and further relief as is just and proper.

Dated: November 23, 2026

BODNER LAW PLLC
By: /s/ Jonathan S. Bodner
Jonathan S. Bodner, Esq.
55 Cherry Lane, Suite 101
Carle Place, New York 11514
(516) 444-3923
jbodner@bodnerlawpllc.com

Local counsel for RLA Consulting LLC, as Trustee of the Creditor Recovery Trust

-and-

THE LAW OFFICES OF RICHARD J. CORBI PLLC
By: /s/ Richard J. Corbi
Richard J. Corbi (*pro hac vice*)
104 West 40th St., 4th Floor
New York, NY 10018
(646) 571-2033
rcorbi@corbilaw.com

Co-counsel for RLA Consulting LLC, as Trustee of the Creditor Recovery Trust

EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

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Richard J. Corbi (pro hac vice)
rcorbi@corbilaw.com
Co-counsel for RLA Consulting LLC, Creditor Recovery Trustee

In re:

CBRM REALTY INC., et al.,

Debtors.

Chapter 11

Case No. 25-15343 (MBK)

(Jointly Administered)

Re: Doc. Nos. 892, [__]

ORDER (I) COMPELLING MIRIAM MIZRACHI TO COMPLY WITH THE ORDER ENTERED OCTOBER 21, 2026 [DOC. NO. 892], (II) AWARDING FEES AND COSTS, AND (III) GRANTING RELATED RELIEF

The relief set forth on the following pages, numbered two (2) through four (4), is hereby ORDERED.

Upon the motion [Doc. No. **[__]**] (the "Motion") of RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC (the "Trustee"), and the Court having considered the Motion, the Declaration of Richard J. Corbi, Esq. filed therewith, any response thereto, and the record of the hearing held on **[__]**, 2026; and the Court having found that Miriam Mizrachi did not comply with paragraphs 4 and 7 of the *Order (I) Compelling Miriam Mizrachi to Comply with the Rule 2004 Subpoena Issued to Her, as Modified, (II) Denying in Part Her Motion to Quash the Subpoena, (III) Overruling in Part Her Objections Thereto, and (IV) Granting Related Relief*, entered October 21, 2026 [Doc. No. 892] (the "October 21 Order"), on or before November 20, 2026; and due and sufficient notice having been given; and good and sufficient cause appearing therefor; IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. Miriam Mizrachi is compelled to comply with the October 21 Order as set forth herein.

3. Within seven (7) days after entry of this Order, Ms. Mizrachi shall: (a) serve on counsel to the Trustee the written certification required by paragraph 4 of the October 21 Order, signed by her under penalty of perjury pursuant to 28 U.S.C. § 1746; (b) produce all documents responsive to the Rule 2004 subpoena dated August 20, 2026 (the "Subpoena") that are in her possession, custody or control and are not withheld under subparagraph (d), including documents held on her behalf by Berkovitch & Bouskila, PLLC, any accountant or any other agent; (c) serve a written response to each request in the Subpoena, stating whether responsive documents exist and whether any are withheld, together with a description of the search performed, identifying the accounts, devices and locations searched and the person who conducted the search, signed by her under penalty of perjury pursuant to 28 U.S.C. § 1746; and (d) serve a log, identifying each

withheld document by date, author, recipients, general subject matter and the basis for the claim, of every document withheld on a claim of attorney-client privilege or work-product protection.

4. The objections in Ms. Mizrachi's Objections and Responses dated November 20, 2026, including the conditioning of production on an ESI protocol or a Rule 502(d) order, are overruled. No objection to the Subpoena may be asserted other than a claim of attorney-client privilege or work-product protection asserted in accordance with paragraph 3(d) of this Order.

5. Paragraph 3 does not require the production of documents to the extent they concern Vecta Partners LLC, Vecta Inc., Vecta Capital LLC, Sunnyside Bancorp, Inc. or Sunnyside Federal Savings and Loan Association of Irvington, or any actual, proposed or abandoned acquisition of, investment in or change in control of a bank or other depository institution. This paragraph is without prejudice to the right of the Trustee to seek such discovery in any adversary proceeding or otherwise by further order of the Court.

6. Ms. Mizrachi shall file a certificate of compliance with this Order within two (2) business days after completing the obligations in paragraph 3.

7. Ms. Mizrachi and Okin Hollander LLC, jointly and severally, shall pay the Trustee the reasonable fees and costs it has incurred from November 20, 2026 through compliance in securing compliance with the October 21 Order, including the Motion and the hearing on it. The Trustee shall file a certification of such fees and costs within fourteen (14) days after entry of this Order. Any objection shall be filed within seven (7) days after the certification is filed. Absent a timely objection, the Court may enter an order fixing the amount without further hearing. Payment shall be made within fourteen (14) days after entry of the order fixing the amount.

8. The October 21 Order remains in full force and effect. Documents produced pursuant to this Order shall be subject to the protective order entered in these cases [Doc. No. 791].

9. All rights of the Trustee to seek further relief in the event of non-compliance with this Order or the October 21 Order, including civil contempt and coercive sanctions, are reserved.

10. The Trustee shall serve a copy of this Order on Ms. Mizrachi and Okin Hollander LLC by e-mail and overnight delivery within one (1) business day after its entry, and shall file a copy in Case No. 25-21650 (MBK).

11. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation and enforcement of this Order.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Co-counsel for RLA Consulting LLC, Creditor Recovery Trustee

In re:	Chapter 11
CBRM REALTY INC., et al.,	Case No. 25-15343 (MBK)
Debtors.	(Jointly Administered)
	Hearing Date: TBD
	Response Deadline: TBD

DECLARATION OF RICHARD J. CORBI, ESQ.

I, Richard J. Corbi, hereby declare that the following statements are true and correct to the best of my knowledge after due inquiry as described herein:

1. I am an attorney and the principal of The Law Offices of Richard J. Corbi PLLC, co-counsel to RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC (the "Trustee"). By Order of this Court, on [DATE], I was admitted on a Pro Hac Vice basis in this case. *See* Main Case Docket No. [ ].

2. I submit this declaration in support of the *Motion of the Creditor Recovery Trustee for Entry of an Order (I) Compelling Miriam Mizrachi to Comply with the Order Entered October 21, 2026 [Doc. No. 892], (II) Awarding Fees and Costs Against Ms. Mizrachi and Her Counsel, Okin Hollander LLC, and (III) Granting Related Relief* (the "Motion").[1] An index of the exhibits to this declaration is filed herewith.

3. A true and correct copy of the letter from Paul S. Hollander, Esq. of Okin Hollander LLC to me dated October 28, 2026, written under paragraph 5 of the Order, is attached hereto as Exhibit A.

4. A true and correct copy of my letter to Paul S. Hollander, Esq. and Rosanne A. Singer, Esq. dated October 28, 2026, concerning paragraphs 4 and 5 of the Order, with its Exhibit A, the Bates index of Ms. Mizrachi's production in the Acquiom proceedings (MM000001–MM000157), is attached hereto as Exhibit B.

5. A true and correct copy of my letter to Paul S. Hollander, Esq. and Rosanne A. Singer, Esq. dated October 28, 2026, concerning paragraph 6 of the Order, is attached hereto as Exhibit C.

6. A true and correct copy of the letter from Paul S. Hollander, Esq. to me dated November 20, 2026, transmitting Ms. Mizrachi's Objections and Responses and a link to her production, is attached hereto as Exhibit D.

[1] Capitalized terms used herein but not defined shall have the meaning ascribed to them in the Motion.

7. A true and correct copy of *Non-Party Miriam Mizrachi's Objections and Responses to Subpoena for Rule 2004 Examination*, dated November 20, 2026, is attached hereto as Exhibit E.

8. A true and correct copy of a schedule, prepared under my direction, of the folders and files comprising Ms. Mizrachi's production of November 20, 2026 is attached hereto as Exhibit F.

9. A true and correct copy of the document titled "Response to Document Requests," captioned *Acquiom Agency Services LLC v. Moshe Silber*, Index No. 654386/2024, dated April 28, 2025, as delivered in Ms. Mizrachi's production of November 20, 2026, is attached hereto as Exhibit G.

10. A true and correct copy of my letter to Paul S. Hollander, Esq. and Rosanne A. Singer, Esq. dated November 21, 2026 is attached hereto as Exhibit H.

11. On November 20, 2026, at 10:16 p.m., I received by e-mail from Okin Hollander LLC the letter at Exhibit D, the Objections and Responses at Exhibit E, and a link to Ms. Mizrachi's production.

12. The production was reviewed under my direction. It consists of two folders, titled "Production Part 2" and "Responsive docs," the second containing a subfolder titled "documents related to debt." "Production Part 2" contains ten files, one of which is a five-page document titled "Response to Document Requests," captioned in *Acquiom Agency Services LLC v. Moshe Silber*, Index No. 654386/2024, signed by Ms. Mizrachi, dated April 28, 2025, and addressed to Bernard D'Orazio, Esq., counsel to Spano Investor LLC (Exhibit G). The remaining files consist of a 2021 joint income tax return and its e-file authorizations; a balance sheet and personal financial statement as of March 31, 2022; an organizational chart; operating agreements and amendments;

a closing binder; insurance materials; a recorded deed; a single mortgage-loan statement; a storage-facility record; and, in the subfolder, more than one hundred copies of pleadings, exhibits and judgments filed in collection and foreclosure actions. None of the documents bears a Bates number.

13. Neither Exhibit D nor Exhibit E contains a written certification by Ms. Mizrachi of whether the documents identified on the Bates index furnished with Exhibit B constitute her complete responsive production in the Acquiom proceedings. No privilege log was served with the production or since.

14. On the review conducted to date, the Trustee has identified no document in the production dated after April 28, 2025.

15. The production includes the complete 2021 joint return, which the Trustee's copy of the Acquiom production lacked, as the Trustee noted in its letter of October 28, 2026 (Exhibit B).

16. Ms. Mizrachi did not ask the Trustee to extend the November 20, 2026 deadline in paragraph 4 of the Order, and the Trustee did not agree to any extension. To my knowledge, no request for an extension or for protection was made to the Court, and no appeal or motion for reconsideration of the Order has been filed.

17. On November 21, 2026, **at 6:36 p.m. (Eastern)**, I sent the letter at Exhibit H to Okin Hollander LLC by e-mail. I did not receive a response.

18. The facts concerning the Acquiom proceedings stated in the Motion are drawn from the documents filed as Exhibits K through O to my declaration filed with the Motion to Compel [Doc. No. 858], and from Exhibit G to this declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: November 23, 2026

THE LAW OFFICES OF RICHARD J. CORBI PLLC

/s/ Richard J. Corbi
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Email: rcorbi@corbilaw.com

Co-counsel for RLA Consulting LLC, in its capacity as Trustee of the Creditor Recovery Trust for CBRM Realty Inc. and Crown Capital Holdings, LLC

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Co-counsel for RLA Consulting LLC, Creditor Recovery Trustee

In re:	Chapter 11
CBRM REALTY INC., et al.,	Case No. 25-15343 (MBK)
Debtors.	(Jointly Administered)
	Hearing Date: [To be set by the Court]
	Response Deadline: [To be set by the Court]

Index of Exhibits to the Declaration of Richard J. Corbi, Esq.

in Support of the *Motion of the Creditor Recovery Trustee for Entry of an Order (I) Compelling Miriam Mizrachi to Comply with the Order Entered October 21, 2026 [Doc. No. 892], (II) Awarding Fees and Costs Against Ms. Mizrachi and Her Counsel, Okin Hollander LLC, and (III) Granting Related Relief*

Exhibit	Description
A	Letter from Paul S. Hollander, Esq. (Okin Hollander LLC) to Richard J. Corbi, Esq. dated October 28, 2026, written under paragraph 5 of the Order.
B	Letter from Richard J. Corbi, Esq. to Paul S. Hollander, Esq. and Rosanne A. Singer, Esq. dated October 28, 2026, concerning paragraphs 4 and 5 of the Order, with its Exhibit A, the Bates index of Ms. Mizrachi's production in the Acquiom proceedings (MM000001–MM000157).
C	Letter from Richard J. Corbi, Esq. to Paul S. Hollander, Esq. and Rosanne A. Singer, Esq. dated October 28, 2026, concerning paragraph 6 of the Order and lists the subpoenas.
D	Letter from Paul S. Hollander, Esq. (Okin Hollander LLC) to Richard J. Corbi, Esq. dated November 20, 2026, transmitting Ms. Mizrachi's Objections and Responses and a link to her production.
E	*Non-Party Miriam Mizrachi's Objections and Responses to Subpoena for Rule 2004 Examination*, dated November 20, 2026, with its Exhibit A (48 pp.).
F	Schedule of the folders and files comprising Ms. Mizrachi's production of November 20, 2026.
G	"Response to Document Requests" of non-party Miriam Mizrachi, *Acquiom Agency Services LLC v. Moshe Silber*, Index No. 654386/2024 (Sup. Ct. N.Y. Cnty.), dated April 28, 2025, as delivered in her production of November 20, 2026.
H	Letter from Richard J. Corbi, Esq. to Paul S. Hollander, Esq. and Rosanne A. Singer, Esq. dated November 21, 2026, demanding compliance with paragraphs 4 and 7 of the Order by 5:00 p.m. (Eastern Time) on November 23, 2026.

Filings of record are not reproduced, including the Order [Doc. No. 892]; the Motion to Compel [Doc. No. 857]; and the Rule 2004 subpoena to Ms. Mizrachi dated August 20, 2026 and the documents from *Acquiom Agency Services LLC v. Silber*, Index No. 654386/2024 (Sup. Ct. N.Y. Cnty.), NYSCEF Doc. Nos. 55, 62, 63, 64, 70 and 107, filed as Exhibits A and K through O to the Declaration of Richard J. Corbi filed with the Motion to Compel [Doc. No. 858].

EXHIBIT A

OKIN HOLLANDER

Okin Hollander LLC
Glenpointe Centre West, 2nd Floor
500 Frank W. Burr Boulevard, Suite 40
Teaneck, NJ 07666
T 201 947 7500
F 201 947 2663

Paul S. Hollander, Esq.
phollander@okinhollander.com

October 28, 2026

VIA ELECTRONIC MAIL

Richard Corbi, Esq.
The Law Offices of Richard J. Corbi PLLC
104 West 40th Street, 4th Floor
New York, NY 10018
rcorbi@corbilaw.com

Re: ***In re CBRM Realty Inc., et al.*, Case No 25-15343 (MBK) (Bankr. D.N.J.)**

Order (I) Compelling Miriam Mizrachi To Comply With The Rule 2004 Subpoena Issued To her, As Modified, (II) Denying In part Her Motion To Quash The Subpoena, (III) Overruling In Part Her Objections Thereto, And (IV) Granting Related Relief [Docket Mo. 892] (the "Order")

okinhollander.com

Dear Mr. Corbi:

In accordance with paragraph 5 of the above-referenced Order, we write to advise that in connection with its representation of Miriam Mizrachi ("Ms. Mizrachi") in the proceeding captioned *Acquiom Agency Services LLC v. Silber*, Index No. 654386/2024 (Sup. Ct. N.Y. Cnty), ("*Acquiom*"), Berkovitch & Bouskila, PLLC ("B&B") has retained its file of documents produced by Ms. Mizrachi in response to a subpoena served on her as a nonparty in that proceeding. Other than B&B, Ms. Mizrachi was not represented by any other counsel as a witness in the *Acquiom* matter.

In furtherance of the provisions of paragraph 4 of the Order, please advise whether you have a Bates stamped index of the production from the *Acquiom* proceeding and if you intend to provide it so that at the appropriate time, we do not re-produce the documents listed on that index.

Very truly yours,

OKIN HOLLANDER LLC

By: */s/ Paul S. Hollander*
Paul S. Hollander

cc: Rosanne A. Singer, Esq.

EXHIBIT B



The Law Offices of Richard J. Corbi PLLC

104 West 40th Street, 4th Floor

New York, NY 10018

October 28, 2026

Via Electronic Mail

Paul S. Hollander, Esq.
Rosanne A. Singer, Esq.
Okin Hollander LLC
Glenpointe Centre West, 2nd Floor
500 Frank W. Burr Boulevard, Suite 40
Teaneck, NJ 07666
phollander@okinhollander.com
Counsel to Ms. Miriam Mizrachi

Re: ***In re CBRM Realty Inc., et al.*, Case No. 25-15343 (MBK) (Bankr. D.N.J.)**

Order Entered October 21, 2026 [Doc. No. 892], Paragraphs 4 and 5 — Bates Index of Ms. Mizrachi's Production in *Acquiom Agency Services LLC v. Silber*

Dear Paul:

Thank you for your letter of October 28, 2026.

In answer to your question: the Trustee has in its possession a copy of a production by Ms. Mizrachi in *Acquiom Agency Services LLC v. Silber*, Index No. 654386/2024 (Sup. Ct. N.Y. Cnty.) ("*Acquiom*") Bates-stamped MM000001 through MM000157 (158 pages, including pages stamped MM000136A and MM000136B). That production includes, at MM000148–MM000152, Ms. Mizrachi's written responses to the subpoena dated April 28, 2025. A Bates index of the production, identifying each document by Bates range, date and description, is enclosed as Exhibit A. The Trustee furnishes Exhibit A for purposes of paragraph 4 of the Order.

Accordingly, under paragraph 4 Ms. Mizrachi need not re-produce the documents listed on Exhibit A. On or before November 20, 2026, she is instead to certify in writing whether the documents identified on Exhibit A constitute her complete responsive production in *Acquiom*, including any supplements, and to identify and produce any responsive materials omitted from it. Paragraph 4 extends to all responsive documents she collected, reviewed or produced in that proceeding, so we ask that the certification address any production made after April 28, 2025, any documents produced in connection with her testimony in that proceeding, and any responsive documents collected or reviewed but not produced.

The Law Offices of Richard J. Corbi PLLC

104 West 40th Street, 4th Floor

New York, NY 10018

Two items appear to be incomplete on the face of the copy we hold, and we ask that the certification address each:

1. Ms. Mizrachi's response to Request No. 2 states that copies of the filed 2021 federal and state tax returns are enclosed. The copy in the Trustee's possession contains the 2021 federal and state e-file signature authorizations (MM000018–MM000024) but not the returns themselves.

2. The Northeast Community Bank statement at MM000005–MM000006 indicates that it continues on a further page, which does not appear in the production.

If the Bates ranges or contents of the file held by Berkovitch & Bouskila differ in any respect from Exhibit A, please identify the differences so that the record of what has been produced is accurate. Exhibit A describes the copy in the Trustee's possession; its descriptions are for identification only, and furnishing it is not a concession that the listed documents are complete or are responsive to the Trustee's subpoena. Documents produced pursuant to the Order remain subject to the Protective Order entered in these cases [Doc. No. 791], as paragraph 9 of the Order provides.

We remain available to meet and confer regarding the production due under paragraph 4. The Trustee reserves all rights and remedies.

Very truly yours,

THE LAW OFFICES OF RICHARD J. CORBI PLLC
Counsel to CBRM Creditor Recovery Trustee

/s/ Richard J. Corbi
Richard J. Corbi

Encl.: Exhibit A — Bates Index of Documents Produced by Miriam Mizrachi in Acquiom Agency Services LLC v. Silber (MM000001–MM000157)
cc: Mr. Daniel Kamensky, Creditor Recovery Trustee

O: (646) 571-2033 M: (516) 582-0649 rcorbi@corbilaw.com www.corbilaw.com

EXHIBIT C

The Law Offices of Richard J. Corbi PLLC

104 West 40th Street, 4th Floor

New York, NY 10018

October 28, 2026

Via Electronic Mail

Paul S. Hollander, Esq.
Rosanne Singer, Esq.
Okin Hollander LLC
Glenpointe Centre West, 2nd Floor
500 Frank W. Burr Boulevard, Suite 40
Teaneck, NJ 07666
phollander@okinhollander.com

Counsel to Ms. Miriam Mizrachi

Re: *In re CBRM Realty Inc., et al.*, Case No. 25-15343 (MBK) (Bankr. D.N.J.) Order Entered October 21, 2026 [Doc. No. 892], Paragraph 6 — Third-Party Subpoenas and Document Requests

Dear Paul:

As you know, this firm represents Daniel Kamensky of RLA Consulting, LLC, in his capacity as Trustee of the CBRM Creditor Recovery Trust (the "Trustee"). I write pursuant to paragraph 6 of the Court's *Order (I) Compelling Miriam Mizrachi to Comply with the Rule 2004 Subpoena Issued to Her, as Modified, (II) Denying in Part Her Motion to Quash the Subpoena, (III) Overruling in Part Her Objections Thereto, and (IV) Granting Related Relief*, entered October 21, 2026 [Doc. No. 892] (the "Order").

Paragraph 6 of the Order directs counsel to the Trustee, within seven days after entry, to provide counsel to Ms. Mizrachi with "copies of all third-party subpoenas and document requests issued to date seeking the production of documents which evidence, refer or relate to Ms. Mizrachi's ownership, control or financial interests in assets."

Copies of those subpoenas and document requests are provided with this letter by secure file-transfer link. Each is listed on the enclosed **Schedule A**, which identifies the recipient and the date of each, and the copies are numbered to correspond to the schedule. Schedule A lists 52 subpoenas (Items 1 through 52) and 3 follow-up letters to subpoena recipients that requested further documents (Items 53 through 55). Item 26 comprises the original and amended subpoenas to BciCapital, Inc.

Several points concerning the schedule:

1. The Rule 2004 subpoena issued to Ms. Mizrachi herself, dated August 20, 2026, is already in your possession and is not repeated.
2. In the interest of completeness, Schedule A includes subpoenas whose requests reach Ms. Mizrachi's interests through a defined term or a general request, as well as those directed to her accounts, property or entity interests by name. Inclusion of an item is not a statement that the recipient holds documents concerning Ms. Mizrachi.
3. The subpoena to Share of New Squared d/b/a Chesed 24/7 (Item 16) has since been withdrawn.

We are also available to meet and confer, as paragraph 13 of the Order contemplates, regarding the production due under paragraph 4 on November 20, 2026.

The Trustee reserves all rights and remedies, and nothing in this letter or in the production of these documents is a concession as to any matter, including the scope of paragraph 6 of the Order.

Very truly yours,
THE LAW OFFICES OF RICHARD J. CORBI PLLC
Counsel to CBRM Creditor Recovery Trustee

/s/ Richard J. Corbi
Richard J. Corbi

Encl.: Schedule A; copies of the subpoenas and document requests listed on Schedule A (by secure file-transfer link)
cc: Mr. Daniel Kamensky, Creditor Recovery Trustee

SCHEDULE A

Third-Party Subpoenas and Document Requests Provided Pursuant to Paragraph 6 of the Order [Doc. No. 892]

A. Rule 2004 Subpoenas

No.	Recipient	Date
1	Shulamis Allon and S Neuburger CPA PLLC	June 4, 2026
2	Colliers	June 5, 2026
3	SSY (first subpoena)	June 13, 2026
4	Bernstein & Pinchuk LLP (second subpoena)	June 6, 2026
5	Bernstein & Pinchuk LLP (third subpoena)	June 29, 2026
6	Phillip M. Stern & Co. (second subpoena)	June 29, 2026
7	CBIZ / Marcum LLP (second subpoena)	June 29, 2026
8	Robinhood	July 2, 2026
9	Premier Property Management, LLC	July 15, 2026
10	Winn Residential	July 15, 2026
11	Providian Real Estate Management, Inc.	July 15, 2026
12	Mayer Brown LLP	August 14, 2026
13	Piper Sandler & Co.	August 14, 2026
14	Bankwell Bank	August 14, 2026
15	EON Technology	August 14, 2026
16	Share of New Squared d/b/a Chesed 24/7 (since withdrawn)	August 17, 2026
17	Phillip M. Stern & Co. (third subpoena)	August 19, 2026
18	SSY (second subpoena)	August 19, 2026
19	Bernstein & Pinchuk LLP (fourth subpoena)	August 19, 2026
20	Shulamis Allon et al. (supplemental subpoena)	August 19, 2026
21	Y H Roth CPA PC	August 19, 2026
22	KeyBank National Association (as property lender)	August 19, 2026
23	Federal Deposit Insurance Corporation, as Receiver for Signature Bridge Bank, N.A.	August 19, 2026
24	Commerce Bancshares Inc. (Commerce Bank)	August 20, 2026
25	JPMorgan Chase Bank, N.A.	August 20, 2026
26	BciCapital, Inc., c/o City National Bank of Florida (original and amended subpoenas)	August 24, 2026 (amended September 17, 2026)
27	Computershare Inc.	August 24, 2026
28	Hinman, Howard & Kattell, LLP	August 24, 2026
29	FinPro Capital Advisors, Inc.	August 24, 2026
30	Thompson LLP	August 24, 2026
31	Egan-Jones Ratings Company	August 24, 2026
32	Levon Capital LLC and Levon Capital Tristate LLC	August 26, 2026

No.	Recipient	Date
33	Avery Weisz	August 26, 2026
34	The Schulman Entities	August 26, 2026
35	DH1 Holdings LLC, CKD Funding LLC and CKD Investor Penn LLC	September 4, 2026
36	Laura Rosenberg	September 5, 2026
37	Keefe, Bruyette & Woods, Inc.	September 5, 2026
38	Flagstar Bank, N.A. (fifth subpoena, supplemental)	September 7, 2026
39	American Express	September 7, 2026
40	Bloomfield Capital	September 7, 2026
41	ABCMN LLC, as Assignee for the Benefit of Creditors of Nussbaum Lowinger	September 7, 2026
42	Katherine (Kat) Grove	September 23, 2026
43	Eli Glassman	October 9, 2026
44	REPAG Accounting Group LLC	October 11, 2026
45	Nir E. Gozal, Esq.	October 11, 2026
46	FourLeaf Federal Credit Union	October 13, 2026
47	Morgan Stanley Smith Barney LLC and Morgan Stanley & Co. LLC	October 13, 2026
48	Copper Capital LLC, Copper Capital Partners LLC and Dov Lazarus	October 13, 2026
49	Yehuda S. Gewirtzman	October 13, 2026
50	Yitzchak Horowitz	October 13, 2026
51	RBC Capital Markets, LLC	October 15, 2026
52	Vecta, Inc. and Sunnyside Federal Savings and Loan Association of Irvington (second subpoena)	October 15, 2026

B. Follow-Up Document Requests to Subpoena Recipients

No.	Recipient and Request	Date
53	Bernstein & Pinchuk LLP — follow-up letter to Rule 2004 subpoenas	August 25, 2026
54	CBIZ / Marcum LLP — second follow-up letter to Rule 2004 subpoena	September 16, 2026
55	KeyBank National Association — search terms, prior productions and outstanding records	October 11, 2026

EXHIBIT D

OKIN HOLLANDER

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November 20, 2026

VIA ELECTRONIC MAIL

Richard Corbi, Esq.
The Law Offices of Richard J. Corbi PLLC
104 West 40th Street, 4th Floor
New York, NY 10018
rcorbi@corbilaw.com

Re: ***In re CBRM Realty Inc., et al.*, Case No 25-15343 (MBK) (Bankr. D.N.J.)**

Miriam Mizrachi's Objections and Responses to Subpoena for Rule 2004 Examination Issued to Her on September 30, 2026

okinhollander.com

Dear Mr. Corbi:

In connection with the above-reference matter, we have attached Miriam Mizrachi's *Objections and Responses to the Subpoena for Rule 2004 Examination* issued to her on September 30, 2026.

We have further attached a link to all of the documents provided to us by Berkovitch & Bouskila, PLLC, Ms. Mizrachi's counsel in the proceeding captioned *Acquiom Agency Services LLC v. Silber*, Index No. 654386/2024 (Sup. Ct. N.Y. Cnty). It is our understanding that the link represents all documents which Ms. Mizrachi, through her counsel in that matter, produced as a nonparty in that proceeding.

Please let us know if you are available on Tuesday, November 24, 2026 for an initial meet and confer in connection with the Objections and Responses.

Very truly yours,

OKIN HOLLANDER LLC

By: */s/ Paul S. Hollander*
Paul S. Hollander

cc: Rosanne A. Singer, Esq.

EXHIBIT E

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re: CBRM REALTY INC., et al., Debtors.	Case No.: 25-15343 (MBK) Chapter: 11 Judge: Hon. Michael B. Kaplan

NON-PARTY MIRIAM MIZRACHI'S OBJECTIONS AND RESPONSES TO SUBPOENA FOR RULE 2004 EXAMINATION

Pursuant to Federal Rule of Civil Procedure 45(d)(2)(B) (made applicable by Federal Rule of Bankruptcy Procedure 9016) and the Bankruptcy Court's October 21, 2026 Order [ECF No. 903] (the "**Order**"), non-party Miriam Mizrachi ("**Ms. Mizrachi**"), by and through her undersigned counsel, Okin Hollander LLC, hereby submits her Objections and Responses to the Subpoena for Rule 2004 Examination (the "**Subpoena**") issued on September 30, 2026 by Daniel Kamensky of RLA Consulting, LLC, in his capacity as liquidation trustee (the "**Liquidation Trustee**") of the Creditor Recovery Trust (the "**Liquidation Trust**") for *In re CBRM Realty Inc.* and *In re Crown Capital Holdings LLC* (collectively, the "**Debtors**").

I. PRELIMINARY STATEMENT

Ms. Mizrachi, a non-party, submits these Objections and Responses under Federal Rule of Civil Procedure 45(d)(2)(B), Federal Rule of Bankruptcy Procedure 9016, and the Court's Order.

Ms. Mizrachi will produce existing, responsive, non-privileged documents, if any, within her possession, custody, or legal control. Because the Subpoena seeks broad categories of personal electronically stored information, she will collect, process, search, review or produce ESI if necessary and appropriate to the needs of the case in accordance with any ESI Protocol (as defined below) and Rule 502(d) Order (as defined below) as agreed upon by the parties or entered by the Court. It is not reasonable to require Ms. Mizrachi to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from any financial institution or other independent third party, records that are not already within her possession, custody, or legal control. Nothing in these responses expands her obligations beyond Rule 45, the Bankruptcy Rules or the Court's Order.

Paragraph 13 of the Order contemplates that the parties will meet and confer regarding any ESI Protocol, additional confidentiality protections, and a Rule 502(d) Order.[1] A discovery conference has been scheduled with respect to the Subpoena and other matters for December 7, 2026 (the "**December 7 Conference**").

For purposes of these Objections and Responses:

"**Existing Protective Order**" means the Stipulation and Protective Order entered by the Court on April 23, 2026 [ECF No. 791]. Consistent with paragraph 9 of the Order, documents produced pursuant to the Order are subject to the Existing Protective Order, as the same may be revised, amended or supplemented at the December 7 Conference.

[1] Additional issues to be addressed concern applicable privileges, including the confidential marital communications privilege; the limits of Ms. Mizrachi's possession, custody, or legal control over records held by others; avoiding unnecessary duplication of records separately subpoenaed by the Liquidation Trustee from financial institutions, accounting firms or bookkeeping firms; inaccessible or burdensome ESI; unrelated private information; and protection of an individual non-party against undue burden and significant expense.

"ESI" means electronically stored information, including emails, text messages, electronic documents, photographs, recordings, and other data stored in any electronic medium.

"**ESI Protocol**" means a written protocol to the extent necessary and appropriate to the needs of the case, governing the identification, collection, processing, search, review, and production of ESI, which may include, as appropriate, custodians, data sources, relevant time periods, search methodology, search terms, production format, metadata, inaccessible or burdensome sources, privilege review, confidentiality protections, and allocation of costs. Any ESI Protocol may also address the manner and scope of preservation, without limiting any preservation obligation otherwise imposed by applicable law. The term means only a protocol agreed to in writing by Ms. Mizrachi and the Liquidation Trustee or entered by the Court. No proposed, draft or unexecuted protocol constitutes an ESI Protocol.

"**Rule 502(d) Order**" means an order entered by the Court under Federal Rule of Evidence 502(d) providing that disclosure of information protected by the attorney-client privilege or work-product doctrine, whether inadvertent or otherwise, does not constitute a waiver in this proceeding or any other federal or state proceeding, and establishing procedures for the identification, return, sequestration, deletion, and, where necessary, challenge of such information. The treatment of confidential marital communications and information subject to any other applicable privilege or protection will be governed by applicable law, the Existing Protective Order (as the same may be revised, amended or supplemented at the December 7 Conference), any ESI Protocol and any additional protections agreed upon by the parties or ordered by the Court.

Ms. Mizrachi has been provided with copies of certain subpoenas (but not any responsive documents relating thereto), which subpoenas are set forth on **Exhibit "A**" hereto (collectively, the "**Exhibit A Subpoenas**")[2] issued by the Liquidation Trustee to various third-party financial

[2] To the extent that the Liquidation Trustee may have issued other subpoenas in addition to the Exhibit A Subpoenas on or after the date of the Order, in connection with the December 7 Conference, counsel to Ms. Mizrachi will request

institutions, accounting firms, bookkeeping firms, independent third parties and other record custodians (collectively, "**Third Party Record Custodians**"), many of which seek records relating to Ms. Mizrachi; accounts opened, maintained or titled in her name, individually or jointly; accounts otherwise held by or for her benefit; or transactions involving her. This includes accounts titled in her name but used or operated primarily for the benefit of a business, entity or other person, regardless of who used or benefited from the account or the funds deposited into it. Many of the Exhibit A Subpoenas were issued to various accounting, bookkeeping, and tax preparation firms which sought copies of various records of Ms. Mizrachi, including but not limited to her tax returns. The Order leaves the Exhibit A Subpoenas in place and requires the Liquidation Trustee to provide Ms. Mizrachi's counsel with copies of the subpoenas and accompanying document requests.

The Liquidation Trustee has elected to obtain account and transaction records directly from the institutions that created and maintain them. Ms. Mizrachi therefore objects to any demand requiring her, at her own expense, to collect, review and reproduce the same institutional records. To the extent Ms. Mizrachi may have any such account or transaction records, such duplicative discovery would impose an unnecessary and disproportionate burden on an individual non-party without materially advancing the Liquidation Trustee's investigation.

After any ESI Protocol and Rule 502(d) Order have been agreed upon by the parties or entered by the Court, and subject to her General and Specific Objections, Ms. Mizrachi will conduct further reasonable searches for and produce existing, responsive, non-privileged documents, if any, then within her possession, custody, or legal control that contain material information not available from the third-party institutional productions or from Third Party Record

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that the Liquidation Trustee provide Ms. Mizrachi with copies of any such additional subpoenas. For purposes of these Objections and Responses, such additional subpoenas shall be treated in all respects as if they are encompassed within the definition of Exhibit A Subpoenas.

Custodians.

It is not reasonable to require Ms. Mizrachi to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from any financial institution records that are not already within her possession, custody, or legal control. This limitation includes records maintained by a financial institution for closed accounts and accounts to which her access has been restricted, suspended or terminated. The fact that an account was opened, maintained or titled in Ms. Mizrachi's name does not establish that she presently has access to the account or legal control over records maintained independently by the financial institution.

Ms. Mizrachi does not propose to collect, review or reproduce account statements, deposit records, cancelled checks, wire-transfer records or other institutional transaction data that the Liquidation Trustee has obtained or can obtain directly through all outstanding third-party subpoenas, including the Exhibit A Subpoenas. At the December 7 Conference, the Court should direct the Liquidation Trustee to disclose and provide copies of the documents received from third parties in response to the Exhibit A Subpoenas or any subsequently served subpoenas.

II. GENERAL OBJECTIONS

The following general objections (collectively, "**General Objections**") are incorporated into each and every response as though fully set forth therein. Any specific objections to an individual request for production (each, a "**Request**," and collectively, the "**Requests**") are in addition to these General Objections.

Ms. Mizrachi objects to the Requests including, without limitation, the definitions and instructions therein, to the extent that they purport to impose obligations on Ms. Mizrachi beyond those imposed by the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure and/or the Local Rules of the United States Bankruptcy Court for the District of New Jersey. Ms. Mizrachi will respond to each Request consistent with the requirements of those rules.

1. Privileged and Protected Communications

Ms. Mizrachi objects to each Request to the extent it seeks material protected by the attorney-client privilege, work-product doctrine, common-interest privilege, confidential marital communications privilege or any other applicable privilege or protection. Ms. Mizrachi and Moshe Silber were validly married during the relevant period and remain married. She asserts the confidential marital communications privilege over communications made between them during the marriage, in confidence, and with the expectation that they would remain private, to the extent protected by applicable law and regardless of medium. At the December 7 Conference, counsel for Ms. Mizrachi will request an alternative or categorical logging procedure with respect to high volume privilege assertions. No ESI will be identified, collected, searched, reviewed or produced unless and until an appropriate ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court.

2. Possession, Custody or Control

Ms. Mizrachi will produce existing, responsive, non-privileged documents, if any, within her possession, custody, or legal control. Because the Subpoena seeks broad categories of personal ESI, she will not identify, collect, process, search, review or produce ESI unless and until an appropriate ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court.

It is unreasonable to require Ms. Mizrachi to request, retrieve, restore, reconstruct or otherwise endeavor to obtain records maintained by a Third Party Record Custodian or requested as part of the Exhibit A Subpoenas that are not already within her possession, custody, or legal control. The ability to request records voluntarily, the fact that an account was formerly titled in her name, or her prior ability to access an account does not, standing alone, establish present possession, custody, or legal control.

3. Avoiding Duplicate Institutional Productions

Ms. Mizrachi objects to collecting, reviewing or reproducing institutional records that the Liquidation Trustee has subpoenaed directly. Rule 45 does not require a non-party to fund a duplicative production that adds no material information. It is unreasonable to require her to reproduce identical institutional records or request or retrieve additional copies of such records from the issuing institution. After any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, she will produce existing, unique, responsive, non-privileged materials, if any, then within her possession, custody, or legal control that contain material information not available from the institutional productions.

4. Transparency Regarding Records Not Duplicated

Where the Liquidation Trustee has subpoenaed institutional records directly, it is unreasonable to require Ms. Mizrachi to reproduce identical copies of those records. To the extent the relevant institution and account category are known to her without undertaking an additional investigation or attempting to obtain inaccessible records, she will identify them as appropriate. Any such identification does not constitute an admission that the institution's records are within her possession, custody, or legal control.

5. Gaps in Third-Party Productions

If the Liquidation Trustee identifies in writing a specific, material gap in an institutional production, Ms. Mizrachi will meet and confer regarding whether a narrowly tailored search of materials already within her possession, custody, or legal control is warranted. Any identification, collection, processing, search, review or production of ESI will remain subject to any ESI Protocol and Rule 502(d) Order. It is unreasonable to require Ms. Mizrachi to request, retrieve, restore,

reconstruct or otherwise endeavor to obtain missing records from financial institutions or any other Third Party Record Custodian, or records otherwise encompassed by the Exhibit A Subpoenas.

To the extent certain bank records were obtained by the Chapter 7 Trustee (the "**Chapter 7 Trustee**") appointed in the related chapter 7 bankruptcy proceeding captioned *In re Silber*, Case No. 25-21650 (MBK) and provided to counsel for Ms. Mizrachi but not to counsel for the Liquidation Trustee, counsel for Ms. Mizrachi will, upon written request, provide copies of such documents produced without conducting any independent review of whether such production was complete.

6. Privacy

Certain financial records sought by the Liquidation Trustee may contain matters unrelated to the Debtors. Ms. Mizrachi reserves the right to redact non-responsive information and personal identifiers to the extent permitted by applicable law and the Existing Protective Order, as the same may be revised, amended or supplemented at the December 7 Conference. Documents produced in response to the Subpoena will be subject to the Existing Protective Order and Rule 502(d) Order. Any confidentiality designation, challenge, use, disclosure or filing shall be governed by the Existing Protective Order as the same may be revised, amended or supplemented at the December 7 Conference.

7. Undue Burden and Significant Expense to a Non-Party

Ms. Mizrachi objects to the Subpoena to the extent it imposes undue burden and significant expense on an individual non-party in violation of Rule 45(d)(1) and (d)(2)(B)(ii). Unlike a corporate litigant or an estate fiduciary backed by estate funds, Ms. Mizrachi is a private individual without corporate IT infrastructure who should not be forced into personally funding forensic e-discovery collections, third-party vendor hosting or line-by-line review of duplicative institutional

records. Requiring an individual non-party to bear the cost of recreating multi-year productions already subpoenaed from banks and other third parties, paying retrieval fees or retaining outside e-discovery vendors is disproportionate under Rule 26(b)(1) and 45(d). Ms. Mizrachi expressly preserves her right to mandatory cost-shifting and protection from significant expense under Rule 45(d)(2)(B)(ii), which she will support in further detail, if necessary.

8. Previously Produced Documents

Consistent with the Order, counsel for Ms. Mizrachi requested and received from Berkovitch & Bouskila, PLLC, her prior counsel in the proceeding captioned *Acquiom Agency Services LLC v. Silber*, Index No. 654386/2024 (Sup. Ct. N.Y. Cnty.), a copy of the document production made in that proceeding, which counsel for Ms. Mizrachi is providing to the Liquidation Trustee simultaneously with these Objections and Responses.

9. ESI, Production Format, Existing Protective Order and Protocol

Unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, Ms. Mizrachi will preserve existing reasonably accessible sources that she reasonably understands may contain potentially responsive ESI, but she will not identify, collect, process, search, review or produce ESI. Nothing in this objection suspends any preservation obligation imposed by applicable law. Documents that can be located and produced without identifying, collecting, processing, searching or reviewing ESI will be addressed subject to Ms. Mizrachi's General and Specific Objections.

10. No Admissions and Reservation of Rights.

Production of any document in response to the Subpoena does not constitute an admission of authenticity, admissibility, ownership, the Liquidation Trustee's characterization of any transfer

or transaction, or the Liquidation Trustee's position that any asset constitutes property of a Debtor's estate. Ms. Mizrachi reserves and preserves all evidentiary objections.

III. OBJECTIONS TO DEFINITIONS

Definition 1 ("YOU") and Definition 2 ("ALL DOCUMENTS")

Ms. Mizrachi objects to these definitions to the extent they treat documents held by any "trustee, nominee or other PERSON" or documents "otherwise available to YOU" as vague, overbroad and exceeding Fed. R. Civ. P. 45. Ms. Mizrachi responds solely on behalf of herself individually and with respect to non-privileged documents held by agents acting strictly under her direct control.

Definition 8 ("AFFILIATES")

Ms. Mizrachi objects to this definition as vague, ambiguous, overbroad and unduly burdensome insofar as it extends to persons or entities indirectly owned, controlled by, under common control with, acting for the benefit of, or otherwise affiliated with the Debtors, Moshe Silber or Fredrick Schulman. She will respond with respect to entities reasonably identifiable from the Subpoena, the Order and information known to her.

Definition 13 ("POSSESSION, CUSTODY OR CONTROL")

Ms. Mizrachi objects to the portion of this definition that includes documents she has the "practical ability to obtain from another PERSON." She will endeavor to produce responsive documents within her possession, custody, or legal control and does not agree that the ability to request a document voluntarily from an independent third party, standing alone, places that document within her control. Nor does an account's current or former title establish that records maintained independently by the financial institution are within her legal control, particularly

where the account has been closed or access thereto has been restricted, suspended or terminated. It is unreasonable to require Ms. Mizrachi to request, retrieve, restore, reconstruct or otherwise endeavor to obtain such records.

Definition 16 ("SUBJECT ENTITIES")

Ms. Mizrachi objects to the open-ended phrase "and any other entity in which YOU hold or held, directly or indirectly, any legal, equitable or beneficial interest" as vague and potentially extending beyond entities connected to the Debtors or transactions under investigation. She objects to any construction of Definition 16 that sweeps in a tax-exempt charitable family foundation merely because she serves as an officer or fiduciary; under applicable corporate and tax law, serving as an officer of a charitable foundation confers a fiduciary governance role, not a "legal, equitable or beneficial interest" in the entity or its charitable assets. Ms. Mizrachi further objects to the Liquidation Trustee's inclusion of "the Silber Family Trust" within the defined term "SUBJECT ENTITIES" to the extent it implies any relationship, knowledge or interest on the part of Ms. Mizrachi, as she has no connection to, knowledge of or interest in such trust. As explained in Response No. 10 below, Ms. Mizrachi has no relationship with, knowledge of or interest in such trust. Finally, Ms. Mizrachi objects to any implication that she possesses legal control over internal corporate, operational or accounting records of any Subject Entity in which she holds solely a passive, nonvoting membership or beneficial interest.

Definition 18 ("RELEVANT TIME PERIOD")

Ms. Mizrachi objects to Definition 18, which defines the "RELEVANT TIME PERIOD" as January 1, 2018 through the present, to the extent that it imposes an overbroad, disproportionate and unduly burdensome temporal scope without regard to the subject matter of the particular Request. The Liquidation Trustee's August 20, 2026 correspondence that accompanied the

Subpoena identifies discrete matters arising principally during 2021 through 2023, including alleged distributions and shareholder-loan activity during 2021 and 2022; payments involving Vecta Partners, LLC ("**Vecta Partners**"), Vecta Bank[3] and Sunnyside Bancorp, Inc. during 2022; a deposit in August 2022; and a transfer agreement effective February 2, 2023. Neither the Subpoena nor the Liquidation Trustee's correspondence identifies any transaction of concern occurring during 2018, 2019 or 2020 or otherwise explains why Ms. Mizrachi's complete personal, financial, tax, property, communications, household and electronic records for those years (and in certain cases, during 2021-2023) are relevant to the Liquidation Trustee's stated investigation.

The burden resulting from the defined period is magnified by the breadth of the Requests to which it applies. Among other things, the Subpoena seeks records concerning every financial account, credit card, real-property interest, transfer received, transfer exceeding $10,000 made to any person, source of household support, tax return, electronic account, device, cloud-storage service, safe-deposit box, stored valuable, vehicle, vessel and aircraft associated with Ms. Mizrachi. Applying an undifferentiated period beginning January 1, 2018 to those categories would require an extensive and improper reconstruction and/or recreation of her personal and financial affairs and would likely capture substantial private information having no connection to the Debtors, the Vecta Bank/Vecta Partners/Sunnyside Bancorp transactions, Rapid Services LLC or any other transaction identified in the Liquidation Trustee's correspondence.

Accordingly, Ms. Mizrachi objects to each Request to the extent it incorporates the entire defined RELEVANT TIME PERIOD without a particularized connection to an identified transaction, asset, entity or potential claim. Subject to and without waiving her General and Specific Objections, Ms. Mizrachi proposes May 27, 2022 through the Petition Date in the above-captioned cases (May 19, 2025) as the presumptive search period for Requests bearing a

[3] Capitalized terms not defined herein shall have the meaning ascribed to them as set forth in the Subpoena.

demonstrated connection to the matters identified in the Liquidation Trustee's correspondence.

To the extent the Liquidation Trustee seeks documents created after the Petition Date, it should identify the particular Request, transaction, asset, custodian and ESI source at issue through the meet-and-confer process contemplated by paragraph 13 of the Order. Ms. Mizrachi reserves all objections to an undifferentiated search beyond the Petition Date.

IV. OBJECTIONS TO INSTRUCTIONS

Instructions 1, 5 and 14: Possession, Custody or Control

Ms. Mizrachi incorporates her General Objections and Objections to Definitions 1, 2 and 13. She objects to producing records held independently by family members, trustees, financial institutions, Third Party Record Custodians or other third parties where those records are not within her possession, custody, or legal control, or which have been separately subpoenaed by the Liquidation Trustee. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain such records from independent third parties. She also objects to producing confidential communications between herself and her husband, Moshe Silber, to the extent protected by applicable privilege.

Instruction 2: Organization and Labeling

Ms. Mizrachi objects under Rule 45(e)(1)(A) to any requirement that she organize and label documents to correspond to specific Requests and will produce any responsive documents as they are kept in the ordinary course of business.

Instructions 3 and 12: Native Format, Metadata and Wire Information

Ms. Mizrachi will not collect, process, search, review or produce ESI unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court

governing scope, sources, methodology, format, privilege, confidentiality, burden and cost allocation.

Instruction 6: Destroyed or Discarded Documents

Ms. Mizrachi objects to the extent this Instruction constitutes an improper interrogatory that exceeds Rule 45 and imposes an undue burden on an individual non-party to reconstruct historical details of routine personal deletions occurring before service of the Subpoena. Any identification, collection, processing, search, review or production of ESI will occur only after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court.

Instructions 7, 8, and 15: Privilege Logs

Ms. Mizrachi incorporates General Objection 1. Ms. Mizrachi reserves the right to request, at the December 7 Conference, an alternative or categorical logging procedure with respect to high volume privilege assertions.

Instructions 9 and 16: Negative Responses and Search Methodology

Ms. Mizrachi objects to these Instructions to the extent they operate as improper interrogatories or require narrative descriptions of her discovery process, personal devices, accounts, data sources or search methodology rather than the production of existing responsive documents. Custodians, devices, accounts, data sources, search terms, date ranges, collection methods, production format and related search methodology should be resolved in any ESI Protocol before any identification, collection, processing, search, review or production of ESI occurs.

Instruction 10: Continuing Duty

Ms. Mizrachi objects to Instruction 10 to the extent it purports to impose a continuing obligation. Subject to that objection, if Ms. Mizrachi identifies additional responsive, non-privileged documents that existed and were within her possession, custody, or legal control as of the applicable compliance date but were inadvertently omitted from any production by her, she will produce them within a reasonable time. Ms. Mizrachi does not agree that the Subpoena itself imposes an open-ended obligation to collect or produce documents created or acquired after the applicable compliance date.

Instruction 11: Preservation

Ms. Mizrachi will comply with her preservation obligations under applicable law. By doing so, she does not adopt the disputed definitions set forth in the Subpoena.

V. REQUEST-SPECIFIC OBJECTIONS AND RESPONSES

Request No. 1: Interests in Entities

> *All documents CONCERNING any legal, equitable or beneficial interest YOU hold or have held in any entity, including each of the SUBJECT ENTITIES: the instrument by which YOU acquired it, the consideration YOU paid, the operating agreement or other governing document, all amendments, all capital account records, and all documents CONCERNING any subsequent transfer or encumbrance.*

RESPONSE:

Ms. Mizrachi objects to Request No. 1 to the extent the phrases "all documents CONCERNING" and "SUBJECT ENTITIES" extend the Request beyond entities reasonably connected to the Debtors or transactions under investigation. Ms. Mizrachi further objects to any interpretation of Request No. 1 that includes a charitable family foundation in which she only

serves as an officer, as fiduciary service does not constitute a "legal, equitable or beneficial interest" in an entity. Ms. Mizrachi also objects to producing internal corporate, operational or accounting records of any entity in which she holds solely a passive, nonvoting membership or beneficial interest, as such internal records are outside her possession, custody, or legal control.

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi will not identify, collect, process, search, review or produce ESI unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court. Thereafter, and subject to her objections, she will conduct a reasonable search for and produce existing, responsive, non-privileged documents, if any, then within her possession, custody, or legal control. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from a financial institution or other independent third party records that are not already within her possession, custody, or legal control.

Request No. 2: The Voting Trust

All documents CONCERNING the Voting Trust of which Nicholas Frungillo, Jr. is trustee, including the trust instrument and all amendments, all documents CONCERNING the deposit of any Vecta or Sunnyside interest into it, all voting instructions given or received, all communications with Mr. Frungillo, and all documents CONCERNING any proposed sale or disposition of Vecta Bank.

RESPONSE:

Ms. Mizrachi objects to Request No. 2 to the extent it seeks internal trust-administration or voting records held independently by Nicholas Frungillo, Jr., as Voting Trustee (the "**Voting Trustee**") or his counsel, or another third party and outside Ms. Mizrachi's possession, custody, or legal control.

Subject to and without waiving her General and Specific Objections, after any ESI Protocol

and Rule 502(d) Order are agreed upon by the parties or entered by the Court, Ms. Mizrachi will conduct a reasonable search for and produce responsive, non-privileged copies of the Voting Trust instrument and amendments then within her possession, custody, or legal control, and responsive, non-privileged communications between herself and Mr. Frungillo concerning the matters identified in the Request, if any. It is unreasonable to require her to undertake to collect or recreate the Voting Trustee's independent administrative files or to request or obtain records from the Voting Trustee or another independent third party. In addition, Ms. Mizrachi is reserving her rights to raise at the December 7 Conference, the extent to which discovery relating to the Voting Trust, Vecta Partners, Vecta, Inc., Sunnyside Bancorp and Sunnyside Federal Savings and Loan Association ("**Sunnyside**") is to continue to be governed by the Subpoena or by a discovery order to be entered with respect to the matters involving (i) the adversary proceeding filed by the Chapter 7 Trustee on October 2, 2026 against Ms. Mizrachi and other defendants [Adv. Proc. No. 26-01446 (MBK)] and the complaint [Docket No. 1] seeking, among other things, to avoid the transfer to her of a 95% non-voting interest in Vecta Partners and to recover that interest, or its value, from her under 11 U.S.C. §§ 548, 544, and 550, together with turnover, declaratory, and injunctive relief (the "**Fraudulent Transfer Action**"); and (ii) the Complaint for Declaratory Judgment and Related relief filed by the Chapter 7 Trustee on October 28, 2026 seeking a declaratory judgment resolving the controversy between the Chapter 7 estate and the Liquidation Trust concerning, among other things, ownership of (a) the membership interests in Vecta Partners; (b) the shares of Vecta, Inc.; (c) Sunnyside; and (d) the proceeds of any sale of the Vecta/Sunnyside interests (the "**Declaratory Judgment Action**").

Request No. 3: The 95% Interest

All documents CONCERNING the indirect ownership interest in Vecta Bank that the Debtor testified at his section 341 meeting on March 30, 2026 he had transferred to YOU,

including the instrument effecting the transfer, the consideration YOU gave, any valuation obtained, all tax reporting of the transfer including any gift tax return, and all documents CONCERNING YOUR present ownership of that interest.

RESPONSE:

Ms. Mizrachi objects to and does not otherwise admit the Liquidation Trustee's characterization of the transaction or ownership interest stated in the Request. She objects to the production of confidential marital communications and attorney-client, work-product, common-interest and other privileged materials.

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi will not identify, collect, process, search, review or produce ESI unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court. Thereafter, and subject to her objections, she will conduct a reasonable search for and produce existing, responsive, non-privileged documents, if any, then within her possession, custody, or legal control. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from a financial institution or other independent third party records that are not already within her possession, custody, or legal control. In addition, Ms. Mizrachi is reserving her rights to raise at the December 7 Conference, the extent to which discovery relating to the Voting Trust, Vecta Partners, Vecta, Inc. and Sunnyside is to continue to be governed by the Subpoena or by a discovery order to be entered with respect to the matters involving the Fraudulent Transfer Action and the Declaratory Judgment Action.

Request No. 4: The Vecta Transfer

All documents and communications CONCERNING the VECTA TRANSFER, including every version of the agreement effective February 2, 2023; all documents CONCERNING its negotiation, drafting and execution; all documents CONCERNING the consideration

YOU gave for it; all valuations or appraisals of the interest transferred; all documents CONCERNING the estate planning purpose asserted for it; and all communications with any attorney, accountant or advisor CONCERNING it, other than communications subject to a valid claim of privilege.

RESPONSE:

Ms. Mizrachi objects to and does not admit the Liquidation Trustee's characterization of the alleged transaction, the nature or percentage of the interest at issue or her present ownership of any such interest. She further objects to the Request to the extent it seeks documents unrelated to the alleged transfer or her present ownership of the specifically identified interest, or seeks confidential marital communications, attorney-client communications, attorney work product, common-interest materials or other privileged or protected information.

Subject to and without waiving her General and Specific Objections, after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, Ms. Mizrachi will conduct a reasonable search for and produce existing, responsive, non-privileged documents, if any, within her possession, custody, or legal control concerning: (i) any instrument effecting the alleged transfer; (ii) consideration provided in connection with it; (iii) any contemporaneous valuation; (iv) tax reporting specifically concerning the alleged transfer; and (v) her present ownership or disposition of the specifically identified interest.

To the extent the required search involves the identification, collection, processing, search or review of ESI, Ms. Mizrachi will preserve potentially responsive ESI and cooperate in good faith in establishing any ESI Protocol and obtaining the Rule 502(d) Order contemplated by the Court's Order. She proposes that such ESI activity occur pursuant to those protections and reserves the right to seek appropriate relief if the parties cannot agree on reasonable procedures.

It is unreasonable to require Ms. Mizrachi to request, retrieve, restore, reconstruct or

otherwise endeavor to obtain from a financial institution or other independent third party records that are not within her possession, custody, or legal control. In addition, Ms. Mizrachi is reserving her rights to raise at the December 7 Conference, the extent to which discovery relating to the Voting Trust, Vecta Partners, Vecta Inc. and Sunnyside is to continue to be governed by the Subpoena or by a discovery order to be entered with respect to the matters involving the Fraudulent Transfer Action and the Declaratory Judgment Action.

Request No. 5: Rapid Services LLC

All documents CONCERNING YOUR interest in Rapid Services LLC, including the Schedule K-1 issued to YOU by that entity, all other Schedules K-1 and Forms 1099 YOU received from it, the instrument by which YOU acquired the interest and the consideration YOU paid, all distributions or payments YOU received from it, and all documents CONCERNING its dealings with any DEBTOR or AFFILIATE.

RESPONSE:

Ms. Mizrachi objects to Request No. 5 to the extent it seeks all documents concerning the operations or dealings of Rapid Services LLC with broadly defined "AFFILIATES," without limitation to a particular transaction or demonstrated connection to a Debtor. Ms. Mizrachi states to the best of her knowledge, that she has not held any legal, equitable or beneficial interest in Rapid Services LLC since the first quarter of 2023. She further states that to the best of her knowledge, while she previously held a one (1%) percent interest, she believes it was passive and nonvoting, and she had no governance authority or legal right to control Rapid Services LLC's operational records, vendor billings, general ledgers or records concerning its dealings with any Debtor or Affiliate. Ms. Mizrachi further states that to the best of her knowledge, she did not receive any distributions or other payments from Rapid Services LLC.

Subject to and without waiving her General and Specific Objections, after any ESI Protocol

and Rule 502(d) Order are agreed upon by the parties or entered by the Court, Ms. Mizrachi will conduct a reasonable search for and produce existing, responsive, non-privileged documents, if any, within her possession, custody, or legal control concerning her former interest in Rapid Services LLC, including any Schedules K-1 or Forms 1099 issued to her, documents concerning her acquisition or disposition of the interest and documents reflecting any distributions or payments to her. To the extent the search requires the identification, collection, processing, search or review of ESI, Ms. Mizrachi will preserve potentially responsive ESI and proceed in accordance with any ESI Protocol and Rule 502(d) protections contemplated by the Court's Order.

It is unreasonable to require Ms. Mizrachi to request or obtain Rapid Services LLC's internal operational or transaction records from that entity or another independent third party where those records are not within her possession, custody, or legal control.

Request No. 6: American Express and Other Credit Cards

All statements and records for the American Express accounts recorded on the books of Rapid Improvements LLC in YOUR name as accounts 97008 and 92025, and for every other credit card, charge card or line of credit issued in YOUR name or used by YOU at any time during the RELEVANT TIME PERIOD, together with all documents identifying who paid each account.

RESPONSE:

Ms. Mizrachi objects to Request No. 6 to the extent it seeks identification, statements or records for personal credit cards, charge cards or lines of credit that had no connection to a Debtor or Subject Entity; were not used for the benefit of, or in connection with the business or operations of, a Debtor or Subject Entity; and were not paid, directly or indirectly, by Moshe Silber, a Debtor, or a Subject Entity, or with funds supplied by or derived from any of them. Such records contain personal financial information unrelated to the matters identified in the Subpoena.

Ms. Mizrachi further objects to collecting, reviewing and reproducing complete account histories obtainable directly from the issuing financial institutions, particularly for closed or cancelled accounts for which she no longer has online access, including the referenced American Express accounts. She also objects to the production of confidential marital communications to the extent protected by the marital communications privilege.

Ms. Mizrachi further objects to Request No. 6 to the extent it seeks historical issuer-generated statements or account records for credit cards opened in her name, including cards used in business operations, such as the American Express accounts recorded on the books of Rapid Improvements LLC as accounts 97008 and 92025, that have, to the best of her information and belief, been cancelled or closed by the issuing financial institutions. As the issuers have terminated those accounts and revoked online access, historical issuer-generated statements are not within Ms. Mizrachi's possession, custody, or legal control.

Ms. Mizrachi further objects to Request No. 6 to the extent it seeks historical issuer-generated statements or account records for every other credit card opened in her name (which includes a Chase credit card and an Apple credit card), both of which involve personal charges for household expenses (including but not limited to food, clothing and school charges) that are wholly unrelated to the matters referenced in the Liquidation Trustee's letter accompanying the Subpoena and that are well beyond the scope of inquiries appropriate for a Rule 2004 subpoena.

Ms. Mizrachi further objects because the Liquidation Trustee has independently subpoenaed certain of the same institutional records from financial institutions and issuers that created and maintain them. It is not reasonable to expect Ms. Mizrachi to bear the burden and expense of duplicating those productions or reconstructing institutional files. She incorporates General Objections 3 through 5.

After any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by

the Court, Ms. Mizrachi will conduct a reasonable search for existing, responsive, non-privileged documents, if any, then within her possession, custody, or legal control. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain issuer-generated or institutionally maintained records that she does not presently possess or have the legal right to access, including records relating to closed accounts or accounts to which her access has been restricted, suspended or terminated.

If the Liquidation Trustee identifies in writing a specific, material gap in an institutional production, Ms. Mizrachi will meet and confer concerning whether a reasonable, targeted search of materials already within her possession, custody, or legal control is warranted. Any identification, collection, processing, search, review or production of ESI will remain subject to any ESI Protocol and Rule 502(d) Order. It is unreasonable to require Ms. Mizrachi to request, retrieve, restore, reconstruct or otherwise endeavor to obtain missing records from the issuing institutions that have already been subpoenaed by the Liquidation Trustee.

Request No. 7: Bank, Brokerage, and Investment Accounts

Documents sufficient to identify every bank, brokerage, investment, custodial, retirement or other financial account held by YOU or for YOUR benefit, individually or jointly, at any institution, at any time during the RELEVANT TIME PERIOD, together with complete statements for each.

RESPONSE:

Ms. Mizrachi objects to Request No. 7 to the extent it seeks the identification of, and complete statements for, every personal financial account held by or for her benefit without any particularized connection to a Debtor, Subject Entity, Moshe Silber or transaction identified in the Liquidation Trustee's investigation. The Request is overbroad and seeks personal financial

information unrelated to the matters identified in the Subpoena. Ms. Mizrachi also objects to duplicative production of institutional records, the disclosure of unrelated private financial information and the production of privileged confidential marital communications.

Ms. Mizrachi further objects because the Liquidation Trustee has independently subpoenaed institutional records from financial institutions and Third Party Record Custodians that created and maintain them. To the best of her knowledge, Ms. Mizrachi only had bank, brokerage or investment accounts with JPMorgan Chase, which the Liquidation Trustee and the Chapter 7 Trustee previously subpoenaed and which responsive documents were, to the best of Ms. Mizrachi's knowledge, already provided to the Liquidation Trustee and the Chapter 7 Trustee. It is not reasonable to expect Ms. Mizrachi to bear the burden and expense of duplicating those productions or reconstructing institutional files. She incorporates General Objections 3 through 5.

After any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, Ms. Mizrachi will conduct a reasonable search for existing, responsive, non-privileged documents, if any, then within her possession, custody, or legal control. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain issuer-generated or institutionally maintained records that she does not presently possess or have the legal right to access, including records relating to closed accounts or accounts to which her access has been restricted, suspended or terminated.

Request No. 8: The August 2022 Deposit

All documents CONCERNING the deposit of approximately $1,000,000 into YOUR checking account in or about August 2022, including the source of the funds, the reason for the payment, and the subsequent use or disposition of those funds.

RESPONSE:

Ms. Mizrachi does not admit the amount, date, source, ownership, destination or characterization of the alleged deposit described in Request No. 8. She objects to the Request to the extent it seeks confidential marital communications or materials protected by any other applicable privilege or protection. Records obtained from JPMorgan Chase by the Chapter 7 Trustee, reflect that on July 18, 2022, a deposit of $1 million was made into Ms. Mizrachi's checking account. Counsel to Ms. Mizrachi understands that these records have already been turned over to the Liquidation Trustee.

Ms. Mizrachi objects because the Liquidation Trustee has independently subpoenaed the same bank-generated records and/or received the same directly from JPMorgan Chase or from the Chapter 7 Trustee. It is unreasonable to expect Ms. Mizrachi to bear the burden and expense of duplicating those productions or reconstructing the banks' historical files. She incorporates General Objections 3 through 5.

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi will not identify, collect, process, search, review or produce ESI unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court. Thereafter, and subject to her objections, she will conduct a reasonable search for and produce existing, responsive, non-privileged documents, if any, then within her possession, custody, or legal control. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from a financial institution or other independent third party records that are not already within her possession, custody, or legal control.

Request No. 9: Real Property

All documents CONCERNING any real property in which YOU hold or have held any interest, including 14 Enclave Boulevard, Lakewood, New Jersey, and including deeds,

mortgages, closing statements, appraisals, insurance policies, and all documents CONCERNING the source of the funds used to acquire, improve or carry each property.

RESPONSE:

Ms. Mizrachi objects to Request No. 9 as overbroad to the extent it seeks records concerning every property without regard to any connection to a Debtor, Subject Entity or transaction under investigation. She also objects to duplicative bank-generated payment records and privileged marital communications.

To the extent the response requires the identification, collection, processing, search, review or production of ESI, Ms. Mizrachi will undertake that work only after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court.

Ms. Mizrachi has identified certain records related to real property owned or controlled by her and will make a good faith attempt to locate additional records of real property owned or controlled by her from third parties involved in the closings related to those properties. Subject to and without waiving her General and Specific Objections, after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, Ms. Mizrachi will produce responsive, non-privileged documents within her possession, custody, or legal control concerning 14 Enclave Boulevard and any other real property shown to be owned by her, including, where available, formation documents, deeds, closing records, loan documents, appraisals and responsive non-privileged correspondence.

Request No. 10: The Silber Family Trust

All documents CONCERNING the Silber Family Trust, including the trust instrument and all amendments, all documents identifying its trustees and beneficiaries, all assets held by it, all distributions from it, and all documents CONCERNING the mortgage with Stifel Bank & Trust on the property at 12 Rustic Road, Lakewood, New Jersey.

RESPONSE:

Ms. Mizrachi objects to Request No. 10 because it seeks records concerning a trust with which she states she has no relationship, role or interest, including records allegedly held independently by the trust, its trustees, Stifel Bank & Trust, or other third parties.

Subject to and without waiving these objections, Ms. Mizrachi states that she has no relationship with, knowledge of, or legal, equitable or beneficial interest in the Silber Family Trust and has never served as its grantor, trustee or beneficiary. Based on her personal knowledge and a reasonable inquiry that did not require the identification, collection, processing, search or review of ESI, she has identified no responsive documents within her possession, custody, or legal control.

Request No. 11: Transfers Received From Moshe Silber

All documents CONCERNING any transfer of money, property or other value received by YOU, directly or indirectly, from Moshe Silber (a/k/a Mark Silber), from any DEBTOR, from any AFFILIATE, or from any PERSON acting for any of them, at any time during the RELEVANT TIME PERIOD, including the date, amount, form and stated purpose of each.

RESPONSE:

Ms. Mizrachi objects to Request No. 11 to the extent it relies on the broad and ambiguous definition of "AFFILIATE" or the undefined phrase "any PERSON acting for" Moshe Silber, a Debtor, or an Affiliate. Those terms potentially encompass persons and entities whose connection to Moshe Silber or a Debtor may be unknown to Ms. Mizrachi and transactions that she could not reasonably identify as responsive. She further objects to the Request to the extent it seeks unrelated private financial information or confidential marital communications protected by the marital communications privilege or any other applicable privilege or protection.

Ms. Mizrachi further objects because based upon her counsel's review of the Exhibit A

Subpoenas, it appears that the Liquidation Trustee has independently subpoenaed some of the same transaction records. It is not reasonable to expect Ms. Mizrachi to bear the burden and expense of duplicating those productions or reconstructing the institutions' historical files. She incorporates General Objections 3 through 5.

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi will not identify, collect, process, search, review or produce ESI unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court. Thereafter, and subject to her objections, she will conduct a reasonable search for and produce existing, responsive, non-privileged documents, if any, then within her possession, custody, or legal control. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from a financial institution or other independent third party records that are not already within her possession, custody, or legal control.

Subject to and without waiving her General and Specific Objections, after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, Ms. Mizrachi will make reasonable efforts to produce documents unique to her files or containing information not ordinarily reflected in the institutional records, including, where applicable, correspondence, transaction instructions, explanations, agreements and source-of-funds materials. It is unreasonable to require her to separately collect, review, and reproduce identical copies of statements, deposit records, cancelled checks, wire-transfer records or other transaction data that the Liquidation Trustee has obtained or can obtain directly from the relevant financial institution. If an institutional production is materially incomplete, Ms. Mizrachi will meet and confer concerning a reasonable, targeted search for specifically identified missing records within her possession, custody, or legal control.

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi states

that as to the interests in Vecta Partners, her Response to Request No. 4 is incorporated herein by reference. As to the 95% Interest, her Response to Request No. 3 is incorporated herein by reference. As to 1070 Haverstraw Holdings, LLC, Ms. Mizrachi states that the records pertaining to that transfer from Moshe Silber to her are not in Ms. Mizrachi's possession, custody or legal control. Ms. Mizrachi will make a good faith attempt to identify the professionals who handled that transaction and request the transfer and closing documents from such parties. As to Mile Estates LLC, Ms. Mizrachi states that the records pertaining to that transfer from Moshe Silber to her are not in Ms. Mizrachi's possession, custody or legal control. Ms. Mizrachi will make a good faith attempt to identify the professionals who handled that transaction and request the transfer and closing documents from such parties.

Request No. 12: Transfers Made by Ms. Mizrachi

All documents CONCERNING any transfer of money, property or other value made by YOU to any PERSON in an amount exceeding $10,000, at any time during the RELEVANT TIME PERIOD, including any transfer to a family member, Trust, foundation, charity or entity.

RESPONSE:

Ms. Mizrachi objects to Request No. 12 as overbroad, disproportionate and unduly burdensome because it seeks documents concerning every transfer exceeding $10,000 made by her to any person during the RELEVANT TIME PERIOD, without limiting the Request to a Debtor, Subject Entity, Moshe Silber or a transaction identified in the Liquidation Trustee's investigation. As written, the Request encompasses unrelated personal expenditures, investments, purchases, family transactions, gifts, charitable contributions and other private financial activity having no apparent connection to the Debtors or the matters identified in the Subpoena. Ms.

Mizrachi further objects to the Request to the extent it seeks unrelated private financial information or confidential marital communications protected by the marital communications privilege or any other applicable privilege or protection.

Ms. Mizrachi further objects because based upon her counsel's review of the Exhibit A Subpoenas, the Liquidation Trustee appears to have independently subpoenaed some of the same bank-generated transaction records. It is not reasonable to expect Ms. Mizrachi to bear the burden and expense of duplicating those productions or reconstructing the institutions' historical files. She incorporates General Objections 3 through 5.

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi will not identify, collect, process, search, review or produce ESI unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from a financial institution or other independent third party records that are not already within her possession, custody, or legal control.

Request No. 13: Sources of Support

All documents CONCERNING the sources of funds used to pay YOUR household and living expenses during the RELEVANT TIME PERIOD, including any payment made on YOUR behalf by any PERSON and any charitable support received.

RESPONSE:

Ms. Mizrachi objects to Request No. 13 because the phrases "YOUR household and living expenses" and "sources of funds used to pay" are vague and ambiguous. The Request does not identify which persons, residence, accounts, obligations or categories of expenses constitute Ms. Mizrachi's "household," "household expenses," or "living expenses." It also does not distinguish

between expenses incurred by or specifically on behalf of Ms. Mizrachi and expenses incurred by, attributable to, or paid for the benefit of another member of a shared family household.

Ms. Mizrachi further objects that the Request is overbroad, disproportionate, unduly burdensome, intrusive and insufficiently connected to an identified Debtor, Subject Entity, transaction, asset, transfer, potential claim or any matter referred to in the Liquidation Trustee's cover letter attached to the Subpoena. As written, the Request could require an investigation of every ordinary household expenditure, payment, gift, loan, charitable benefit and other form of support received by Ms. Mizrachi or another household member throughout the entire RELEVANT TIME PERIOD. The term "charitable support" is likewise vague and undefined and could encompass cash, gifts, loans, services, payments in kind or benefits provided to other household members.

Ms. Mizrachi also objects to the extent the Request seeks confidential marital communications protected by the marital communications privilege or attorney-client communications, attorney work product, common-interest materials or information protected by any other applicable privilege or protection.

Ms. Mizrachi further objects because based on her counsel's review of the Exhibit A Subpoenas, it appears that the Liquidation Trustee has independently subpoenaed the same records from third party financial institutions. It is not reasonable to expect Ms. Mizrachi to bear the burden and expense of reconstructing years of household spending, reconstructing household spending based upon records produced by financial institutions, investigating accounts she did not own or control or obtaining duplicative records from financial institutions or other independent third parties that are not within her possession, custody, or legal control. She incorporates General Objections 3 through 5.

The burden of the Request substantially outweighs its likely benefit because it would

require Ms. Mizrachi to identify and investigate years of ordinary household expenditures, determine the source of funds used for each expense, analyze accounts and transactions she may not have controlled, distinguish among funds from multiple sources, review personal and third-party financial information and duplicate institutional records already subpoenaed by the Liquidation Trustee.

To the extent the response requires the identification, collection, processing, search, review or production of ESI, Ms. Mizrachi will undertake that work after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court.

Request No. 14: Tax Returns

All federal, state and local income tax returns, extensions and amendments filed by YOU or on YOUR behalf, jointly or individually, for each year within the RELEVANT TIME PERIOD, together with all Schedules K-1 and Forms 1099 received, all supporting schedules and workpapers, and all gift tax returns.

RESPONSE:

Ms. Mizrachi objects to Request No. 14 as overbroad, disproportionate, unduly burdensome and an unwarranted intrusion into the private financial and tax affairs of an individual non-party. The Request seeks complete federal, state, and local tax files for the entire RELEVANT TIME PERIOD without limiting the demand to information concerning Moshe Silber, a Debtor, a named Subject Entity or a transaction or asset identified in the Liquidation Trustee's investigation. Complete tax returns and related files contain highly sensitive information unrelated to the Liquidation Trustee's investigation, including information concerning other income, assets, deductions, charitable contributions, personal identifiers, estate planning and third parties.

Based upon the information the Liquidation Trustee provided, the Liquidation Trustee

previously requested the same tax returns without Ms. Mizrachi's permission or consent, from no fewer than three (3) Third Party Record Custodians, including but not limited to Phillip M. Stern & Company, CBIZ-Marcum and Bernstein & Pinchuk. It is unreasonable to require her to produce the same records the Liquidation Trustee has already subpoenaed and presumably received from those third parties.

Ms. Mizrachi does not have any "supporting schedules and workpapers" relating to any of her tax returns. Such documents were also previously requested by the Liquidation Trustee from certain Third Party Record Custodians without prior notice to Ms. Mizrachi. It is unreasonable to require her to obtain or recreate materials maintained by an independent accountant or tax preparer that are not within her possession, custody, or legal control. She also preserves all applicable attorney-client, work-product and other privileges and protections, which will be asserted on a document-specific basis.

Ms. Mizrachi separately objects to the demand for all gift-tax returns because it is not limited to a transfer involving Moshe Silber, a Debtor, a named Subject Entity, the Vecta or Sunnyside interests or another specifically identified transaction or asset. Any request for a gift-tax return should be tied to a transfer relevant to the Liquidation Trustee's investigation.

The Liquidation Trustee has already subpoenaed the relevant information through other sources, including but not limited to numerous Third Party Record Custodians, without prior notice to Ms. Mizrachi, including Schedules K-1, Forms 1099, transaction-specific schedules, bank and brokerage records, entity records and documents concerning identified transactions.

Subject to and without waiving her General and Specific Objections, after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, and with any production subject to the Existing Protective Order as the same may be revised, amended or supplemented at the December 7 Conference, Ms. Mizrachi will conduct a reasonable search for

responsive, non-privileged tax materials within her possession, custody, or legal control and reserves the right to redact any unrelated information. To the extent the response requires the identification, collection, processing, search, review or production of ESI, Ms. Mizrachi will undertake that work after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court.

To the extent that they are in her possession, custody or legal control, Ms. Mizrachi will produce responsive Schedules K-1, Forms 1099 and relevant schedules, excerpts or portions of returns. She will also produce gift-tax returns, if any, or responsive portion thereof, reporting a specifically identified transfer or asset relevant to the investigation. Subject to the Order and Existing Protective Order, as the same may be revised, amended or supplemented at the December 7 Conference, she will redact unrelated information, personal identifiers and nonresponsive third-party information and identify the nature of the redactions.

It is unreasonable to require Ms. Mizrachi to produce complete returns or entire tax files where targeted materials provide the relevant information.

Request No. 15: Documents Produced at the May 2025 Deposition

> *All documents YOU produced, brought or referred to at YOUR deposition taken on or about May 8, 2025, including the organizational chart and the financial records produced there, together with all documents CONCERNING how YOU obtained each of them and from whom.*

RESPONSE:

Ms. Mizrachi will produce the documents covered by paragraph 4 of the Order. In an effort to comply with paragraph 4 of the Order, counsel for Ms. Mizrachi requested and received from Berkovitch & Bouskila, PLLC, her prior counsel in the proceeding captioned *Acquiom Agency*

Services LLC v. Silber, Index No. 654386/2024 (Sup. Ct. N.Y. Cnty.), a copy of the document production made in that proceeding, which counsel for Ms. Mizrachi is providing to the Liquidation Trustee simultaneously with these Objections and Responses.

Request No. 16: Organizational Charts and Ownership Records

Every organizational chart, ownership schedule, entity list, capitalization table or funds-flow diagram CONCERNING any DEBTOR, AFFILIATE or SUBJECT ENTITY in YOUR possession, custody or control, in native format where available.

RESPONSE:

Other than as set forth in the Response to Request 15, Ms. Mizrachi will conduct a reasonable search but to the best of her knowledge, does not appear to have any other organizational chart, or ownership schedule, entity list, capitalization table or funds flow diagram in her possession, custody or legal control.

Request No. 17: Communications with Moshe Silber

All communications between YOU and Moshe Silber (a/k/a Mark Silber) CONCERNING any DEBTOR, AFFILIATE or SUBJECT ENTITY, any transfer of any interest or asset, any bank account, or any tax return, by any medium including e-mail, text message, WhatsApp, Signal or any similar platform.

RESPONSE:

Ms. Mizrachi objects to Request No. 17 because it expressly seeks private communications between spouses concerning an exceptionally broad range of financial, family, tax, estate-planning, property and business matters. Ms. Mizrachi and Moshe Silber were validly married when the requested communications would have occurred and remain married. She asserts the

confidential marital communications privilege with respect to communications made between them during their marriage, in confidence, and with the expectation that the communications would remain private, to the extent protected by applicable law. The privilege applies regardless of whether the qualifying communication occurred by e-mail or another electronic medium.

Ms. Mizrachi further objects to Request No. 17 as vague, overbroad, disproportionate and unduly burdensome. The Request is not limited to an identified transaction, account, asset, tax item, Debtor, named Subject Entity or period of time. Instead, it purports to reach every communication between the spouses concerning any interest or asset, any bank account, or any tax return, as well as any Debtor, broadly defined Affiliate or Subject Entity. Read literally, the Request could encompass years of private communications concerning ordinary household finances, jointly filed tax returns, personal and family assets, estate planning, routine banking matters, charitable activity and transactions having no demonstrated connection to the Debtors or the matters identified in the Liquidation Trustee's investigation.

The phrases "any transfer of any interest or asset," "any bank account," and "any tax return" are particularly overbroad. They contain no limiting connection to Moshe Silber, a Debtor, a named Subject Entity, the Vecta or Sunnyside interests, Rapid Services LLC, or another transaction identified in the Liquidation Trustee's August 20, 2026 correspondence or the Subpoena. The Request therefore would require collection and review of nearly every financial communication between Ms. Mizrachi and her spouse merely because it refers to an account, asset, transfer or tax matter, regardless of relevance.

The Request also imposes a substantial and disproportionate ESI burden on an individual non-party. Compliance, as written, would require Ms. Mizrachi to identify, collect and process years of personal communications; review each communication for responsiveness, marital privilege, attorney-client privilege, work product, and unrelated third-party information; and

prepare a privilege log potentially identifying a substantial volume of private marital communications. That burden is not proportional to the likely benefit of the Request, particularly where the Liquidation Trustee has not identified specific transactions, date ranges or communications believed to exist.

The burden and intrusion are further disproportionate because the Liquidation Trustee can investigate the underlying transactions without obtaining privileged communications between spouses. Bank statements, entity records, transfer instruments and other objective transaction documents may establish the existence, amount, source, destination, ownership or disposition of funds or property without invading confidential marital communications. The Liquidation Trustee has also independently subpoenaed financial institutions, including but not limited to JPMorgan Chase Bank, N.A. for account-opening documents, statements, deposit records, checks, wires and transaction data. The existence of an underlying transaction does not justify wholesale disclosure of privileged or unrelated communications merely because the spouses may have discussed it.

Ms. Mizrachi further objects to the extent the Request seeks communications protected by the attorney-client privilege, work-product doctrine, common-interest privilege or any other applicable privilege or protection; communications involving unrelated third parties; or personal and financial information concerning family members, charitable organizations, jointly held accounts or other persons whose affairs have no demonstrated connection to the Debtors or the Liquidation Trustee's investigation.

Subject to and without waiving her General and Specific Objections, it is unreasonable for Ms. Mizrachi to be required to identify, collect, process, search, review or produce ESI unless and until any ESI Protocol and Rule 502(d) Order, are agreed upon by the parties or entered by the Court. Thereafter, and subject to her objections, she will conduct a reasonable, targeted search for existing, responsive, non-privileged communications, if any, then within her possession, custody,

or legal control that concern:

1. a specifically identified transfer by the Liquidation Trustee of money, property or an ownership interest involving a Debtor or named Subject Entity;
2. the Vecta or Sunnyside interests, the August 2022 deposit, Rapid Services LLC or another transaction specifically identified in the Liquidation Trustee's August 20, 2026 correspondence or the Subpoena; or
3. other than a bank account that the Liquidation Trustee already subpoenaed from a third party and from which it received responsive documents as part of the Exhibit A Subpoenas, a bank account that received, held or transmitted funds supplied by, derived from, or transferred to Moshe Silber, a Debtor or a named Subject Entity.

Ms. Mizrachi will withhold qualifying confidential marital communications and other privileged or protected materials. Ms. Mizrachi reserves the right to propose an alternative or categorical logging procedure with respect to confidential marital communications, as a document-by-document log would impose a disproportionate burden.

Request No. 18: Communications with Others

All communications between YOU and Fredrick (Frederick) Schulman, Laura Rosenberg, Avi Orlansky, Ms. Shulamis Allon, Phillip M. Stem & Company, Bernstein & Pinchuk LLP or MBP Global LLP, Y H Roth CPA PC, Schneider, Schecter & Yoss, LLP, or any accountant, bookkeeper or financial advisor, CONCERNING any DEBTOR, AFFILIATE or SUBJECT ENTITY.

RESPONSE:

Ms. Mizrachi objects to Request No. 18 as vague, overbroad, disproportionate and unduly burdensome because it seeks all communications with numerous persons, firms and any accountant, bookkeeper or financial advisor concerning broadly defined Debtors, Affiliates or

Subject Entities, without limitation to an identified transaction or relevant period. She further objects to the extent the Request seeks attorney-client communications, work product, common-interest communications, confidential marital communications embedded in forwarded materials, or unrelated private and third-party information. To the extent responsive communications or substantially identical records have already been produced by the identified persons or firms, or are obtained through the Exhibit A Subpoenas, Ms. Mizrachi incorporates General Objections 3 through 5 and objects to duplicative collection, review and production at her expense.

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi will not identify, collect, process, search, review or produce ESI unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from a financial institution or other independent third party records that are not already within her possession, custody, or legal control.

Request No. 19: Role and Services

All documents CONCERNING any role YOU held or services YOU performed for any DEBTOR, AFFILIATE or SUBJECT ENTITY, including any officer, director, member, manager or employee position, any compensation received, and any document YOU signed on behalf of any of them.

RESPONSE:

Ms. Mizrachi objects to Request No. 19 as vague, overbroad, disproportionate and unduly burdensome because it relies on the broad definitions of "AFFILIATE" and "SUBJECT ENTITY" and is not limited to an identified entity, role, service, transaction or relevant period.

Ms. Mizrachi further objects to any assumption that performing compensated services for

an entity established ownership, management authority, operational control or access to the entity's records. Any compensated role was limited to the services she actually performed and did not, merely by reason of that role or compensation, give her authority to manage the entity or obtain its corporate, accounting or operational records.

Likewise, to the extent Ms. Mizrachi held an interest in any responsive entity, other than 41 Powder Horn LLC, Powder Horn Development LLC, 14 Enclave Owner, LLC, 1070 Haverstraw Holdings, LLC and Mile Estates LLC, that interest, to the best of Ms. Mizrachi's knowledge, was passive and nonvoting and did not confer management authority, operational control or a legal right to obtain the entity's internal records. Such records are not within her possession, custody, or legal control merely because she held an economic or beneficial interest. Nor does service as an uncompensated officer or fiduciary of a charitable foundation confer personal ownership of, or legal control over, the foundation or its independent records.

Ms. Mizrachi also objects to Request No. 19 as cumulative and duplicative of Requests Nos. 1, 3–5, 11, 14, 16, and 18, which separately seek documents concerning her alleged ownership interests, compensation, transfers, tax reporting, entity records and related communications.

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi will not identify, collect, process, search, review or produce ESI unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court. Thereafter, and subject to her objections, she will conduct a reasonable search for and produce existing, responsive, non-privileged documents, if any, then within her possession, custody, or legal control. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from a financial institution or other independent third party records that are not already within her possession, custody, or legal control.

Request No. 20: Safe Deposit Boxes and Stored Property

All documents CONCERNING any safe deposit box, storage unit or similar facility rented by or accessible to YOU, and all documents CONCERNING any cash, precious metals, jewelry, artwork or other valuables held by YOU outside a financial institution.

RESPONSE:

Ms. Mizrachi had no safety deposit boxes. Accordingly, there are no documents presently known to be available for production in response to Request No. 20.

Request No. 21: Aircraft, Vessels, and Vehicles

All documents CONCERNING any aircraft, vessel or motor vehicle owned, leased, chartered or used by YOU or made available for YOUR use, including any aircraft of Stallion Aviation LLC and any vessel recorded on the books of any SUBJECT ENTITY.

RESPONSE:

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi states that she has only owned or leased ordinary automobiles and that Moshe Silber arranged for her to have access to those vehicles. Certain vehicles were leased in Ms. Mizrachi's name but to the best of her knowledge, Ms. Mizrachi does not have any documents concerning such vehicles leased in her name. She has not, during the RELEVANT TIME PERIOD or otherwise, owned, leased, chartered, or held any legal, equitable, or beneficial interest in any aircraft or vessel, including any aircraft of Stallion Aviation LLC or any vessel recorded on the books of a Debtor or named Subject Entity.

Request No. 22: Devices, Accounts, and Retention

Documents sufficient to identify every e-mail account, mobile device, computer, tablet and

cloud storage service used by YOU during the RELEVANT TIME PERIOD; and all documents CONCERNING any deletion, loss or destruction of documents responsive to this subpoena.

RESPONSE:

Ms. Mizrachi objects to Request No. 22 as vague, overbroad, disproportionate, unduly burdensome and unduly intrusive into the private electronic affairs of an individual non-party. The Request seeks a comprehensive historical inventory of every personal account, device, computer, tablet and cloud-storage service she used during the RELEVANT TIME PERIOD, without limiting the demand to sources reasonably likely to contain responsive information.

Ms. Mizrachi further objects to the extent the Request requires her to create an inventory or narrative that does not already exist; reconstruct historical deletion, retention, device-replacement or data-migration practices; identify obsolete or inaccessible sources; undertake a forensic investigation; or disclose security information and unrelated personal or third-party data.

Unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, Ms. Mizrachi will preserve reasonably accessible potentially responsive sources but will not identify, collect, process, search, review or produce ESI.

Ms. Mizrachi also objects to the demand for documents concerning "any deletion, loss or destruction" as overbroad and unsupported by any particularized basis to believe that responsive information was improperly destroyed. The Request improperly encompasses routine, automatic, accidental, unrelated and pre-preservation deletion or loss.

Subject to and without waiving her General and Specific Objections, Ms. Mizrachi will not identify, collect, process, search, review or produce ESI unless and until an appropriate ESI Protocol and Rule 502(d) Order, to the extent necessary, are agreed upon by the parties or entered by the Court. Thereafter, and subject to her objections, she will conduct a reasonable search for

and produce existing, responsive, non-privileged documents, if any, then within her possession, custody, or legal control. It is unreasonable to require her to request, retrieve, restore, reconstruct or otherwise endeavor to obtain from a financial institution or other independent third party records that are not already within her possession, custody, or legal control.

Request No. 23: Persons Holding Your Records

Documents sufficient to identify every accountant, bookkeeper, attorney, financial advisor, trustee or other PERSON who holds or has held documents CONCERNING YOUR financial affairs, and the categories of documents each holds.

RESPONSE:

Ms. Mizrachi objects to Request No. 23 as vague, ambiguous, overbroad, disproportionate, unduly burdensome and intrusive. The phrase "holds or has held" is undefined and does not specify whether it refers to present or prior possession, custody or legal control, temporary receipt or review, retention of copies, or documents later returned, transferred or destroyed. The Request also contains no relevant time, subject-matter, transaction, entity or document-category limitation and assumes that Ms. Mizrachi knows what records independent third parties presently retain or previously retained.

Ms. Mizrachi further objects to the extent the Request requires her to create a directory or narrative that does not exist, reconstruct historical professional relationships, investigate third parties' record-retention practices or provide information outside her personal knowledge. She also objects to identifying attorneys or categories of legal records where doing so would disclose privileged communications, legal advice, litigation strategy, work product or other protected information.

To the extent the response requires the identification, collection, processing, search, review

or production of ESI, Ms. Mizrachi will undertake that work after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court.

Subject to and without waiving her General and Specific Objections, after any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, if Ms. Mizrachi knows from personal knowledge, or learns from a reasonable search conducted in response to a particular substantive Request, that a third-party custodian presently holds responsive records, she will identify that custodian in connection with that Request where relevant and appropriate. Such identification will not constitute an admission that the records are within her possession, custody, or legal control.

It is unreasonable to require Ms. Mizrachi to create a separate directory that does not already exist, reconstruct the identity of every person who may previously have possessed or reviewed records concerning her financial affairs, investigate records retained by independent third parties or request that a third party retrieve records outside her possession, custody, or legal control.

GENERAL RESERVATION OF RIGHTS

These Objections and Responses are based on the information presently known and reasonably available to Ms. Mizrachi following a reasonable inquiry.

Ms. Mizrachi does not waive any objection, privilege, protection or right by agreeing to produce documents subject to the objections stated above. Production of responsive materials is not an admission concerning the relevance, authenticity, admissibility, ownership or characterization of any document, transaction, asset or interest.

Ms. Mizrachi reserves all rights to amend or supplement these responses as required by applicable law or further Court order. No supplementation will expand her obligations beyond existing documents then within her possession, custody, or legal control. Unless and until any ESI Protocol and Rule 502(d) Order are agreed upon by the parties or entered by the Court, no

identification, collection, processing, search, review or production of ESI will occur. Nothing in these Objections and Responses requires Ms. Mizrachi to request, retrieve, restore, reconstruct or otherwise endeavor to obtain records maintained by a financial institution or other independent third party, including records relating to closed accounts or accounts to which her access has been restricted, suspended or terminated.

Dated: November 20, 2026

Respectfully submitted,

OKIN HOLLANDER LLC

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Exhibit A

Exhibit A Subpoenas

1. CBRM Shulamis Allon – Rule 2004 Subpoena 6.24.26
2. Colliers International Group Inc.– Rule 2004 Subpoena 6.5.26
3. Schneider, Schecter & Yoss, LLP- Rule 2004 Subpoena 6.13.26
4. Bernstein & Pinchuk – Rule 2004 Subpoena 6.6.26 (Second)
5. Bernstein & Pinchuk -Third Rule 2004 Subpoena (Final) 6.29.26
6. Phillip Stern - Second Rule 2004 Subpoena 6.29.26
7. CBIZ - Marcum - Second Rule 2004 Subpoena (Final) 6.29.26
8. Robinhood Securities LLC - Rule 2004 Subpoena 7.2.26
9. Premier Property Management, LLC - Rule 2004 Subpoena 7.15.26
10. Winn Residential -Rule 2004 Subpoena 7.15.26
11. Providian Real Estate Management Inc.– Rule 2004 Subpoena 7.15.26
12. Mayer Brown LLP – Rule 2004 Subpoena 8.14.26
13. Piper Sandler – Rule 2004 Subpoena 8.14.26
14. Bankwell Financial Group, Inc.- Rule 2004 Subpoena 8.14.26
15. EON Technology- Rule 2004 Subpoena 8.14.26
16. Chesed 24/7 – Rule 2004 Subpoena 8.17.26
17. Philip Stern – Third Rule 2004 Subpoena 8.19.26
18. Schneider, Schecter & Yoss, LLP - Second Rule 2004 Subpoena 8.19.26
19. Bernstein & Pinchuk LLP / MBP Global LLP 4th Rule Subpoena 8.19.26
20. Shulamis et al. - Rule 2004 Supplemental Subpoena 8.19.26
21. Yechiel Roth, CPA / Custodian of Records – Rule 2004 Subpoena 8.19.26
22. Key Bank (Property Lender) – Rule 2004 Subpoena 8.19.26
23. FDIC as Receiver for Signature Bridge Bank, N.A.- Rule 2004 Subpoena 8.19.26
24. Commerce Bancshares Inc. – Rule 2004 Subpoena 8.19.26
25. JP Morgan – Rule 2004 Subpoena 8.20.26

26a. BciCapital Inc. – Rule 2004 Subpoena 8.24.26

26b. BciCapital Inc. – Rule 2004 Subpoena 9.17.26

27. Computersshare Inc. – Rule 2004 Subpoena 8.24.26
28. Hinman Howard & Kattell, LLP– Rule 2004 Subpoena 8.24.26
29. FinPro Capital Advisors, Inc.– Rule 2004 Subpoena 8.24.26

30. Thompson LLP – Rule 2004 Subpoena 8.24.26
31. Egan-Jones Ratings Company – Rule 2004 Subpoena 8.24.26
32. Levon Capital LLC – Rule 2004 Subpoena 8.26.26
33. Levon Individual – Rule 2004 Subpoena 8.26.26
34. Schulman Entities – Rule 2004 Subpoena 8.26.26
35. DH1 Holdings, et al. – Rule 2004 Subpoena 9.4.26
36. L. Rosenberg – Rule 2004 Subpoena 9.5.26
37. Keefe, Bruyette & Woods, Inc. - Rule 2004 Subpoena 9.5.26
38. Flagstar Bank N.A. – 5th Rule 2004 Supplemental Subpoena 9.7.26
39. American Express Company - Rule 2004 Subpoena 9.7.26
40. Bloomfield Capital Holdings LLC – Rule 2004 Subpoena 9.7.26
41. Nussbaum – Rule 2004 Subpoena 9.7.26
42. Katherine Grove c/o Premier Property Management, LLC – Rule 2004 Subpoena 9.23.26
43. Eli Glassman – Rule 2004 Subpoena 10.9.26
44. REPAG Accounting Group LLC - Rule 2004 Subpoena 10.11.26
45. Nir E. Gozal, Esq. c/o Berkowitz, Trager & Trager, LLC - Rule 2004 Subpoena 10.11.26
46. Four Lead Federal Credit Union – Rule 2004 Subpoena 10.13.26
47. Morgan Stanley Smith Barney LLC – Rule 2004 Subpoena 10.13.26
48. Copper Capital LLC – Rule 2004 Subpoena 10.13.26
49. Gewirtzman – Rule 2004 Subpoena 10.13.26
50. Horowitz – Rule 2004 Subpoena 10.13.26
51. RBC Capital Markets, LLC – Rule 2004 Subpoena 10.15.26
52. Sunnyside Federal Savings – Second Rule 2004 Subpoena 10.15.26
53. B&P – Fifth Rule 2004 Subpoena Cover Letter and Demand 8.25.26
54. Marcum-CBIZ 2nd Follow up Rule 2004 Subpoena 9.16.26
55. KeyBank – Search Terms Prior Productions and Outstanding Records 10.11.26

EXHIBIT F

SCHEDULE OF THE FOLDERS AND FILES COMPRISING MS. MIZRACHI'S PRODUCTION OF NOVEMBER 20, 2026

In re CBRM Realty Inc., et al., Case No. 25-15343 (MBK) (Bankr. D.N.J.)

This schedule lists, by folder, each file in the production made available by Okin Hollander LLC with its letter of November 20, 2026, as downloaded by the Trustee, with the file name and size as received. The file names are those assigned by the producing party. Where two files have identical names (apart from a "(1)" suffix) and identical sizes, that is noted.

No.	Folder	File name (as produced)	Size (KB)	Note
1	Production Part 2	01052023First Amendment and Reinstatement of Operating Mile Est .pdf	35	
2	Production Part 2	17884_5A1A8C4576_00006.pdf	290	
3	Production Part 2	6B3FCBDB.pdf	138	
4	Production Part 2	9.2024.pdf	54	
5	Production Part 2	E - OA.pdf	697	
6	Production Part 2	First Amendment Powder Horn Devlopment .pdf	76	
7	Production Part 2	OA- POWDER HORN DEVELOPMENT LLC 05212020.pdf	190	
8	Production Part 2	second amendment powder horn dev .pdf	68	
9	Production Part 2	Signed Sub Response.pdf	319	
10	Production Part 2	Statement (21).pdf	85	
11	Responsive docs	1070 Closing Binder.pdf	614	
12	Responsive docs	2021 MOSHE SILBER & MIRIAM MIZRACHI E-FILES (1).pdf	375	
13	Responsive docs	2021 MOSHE SILBER & MIRIAM MIZRACHI ITR (1).pdf	1,829	
14	Responsive docs	41 Powder horn - insurance Binder.pdf	90	
15	Responsive docs	Balance Sheet and PFS.pdf	163	
16	Responsive docs	EOP - 1070 Haverstraw[1].pdf	16	
17	Responsive docs	EOP - 41 Powder Horn Dr.pdf	19	
18	Responsive docs	Insurance Policies.pdf	1,050	
19	Responsive docs	Org Chart.pdf	85	
20	Responsive docs	Powderhorn (Tax Forms)[1].pdf	432	
21	Responsive docs	Recorded Deed[2].pdf	167	
22	Responsive docs	Storage facility info.pdf	30	
23	Responsive docs / documents related to debt	031314_2025_AMERICAN_EXPRESS_NATIO_v_AMERICAN_EXPRESS_NATIO_EXHIBIT_S__2.pdf	2,387	
24	Responsive docs / documents related to debt	031314_2025_AMERICAN_EXPRESS_NATIO_v_AMERICAN_EXPRESS_NATIO_SUMMONS___COMPLAINT_1.pdf	941	
25	Responsive docs / documents related to debt	031402_2025_AMERICAN_EXPRESS_NATIO_v_AMERICAN_EXPRESS_NATIO_EXHIBIT_S__2.pdf	1,779	
26	Responsive docs / documents related to debt	031402_2025_AMERICAN_EXPRESS_NATIO_v_AMERICAN_EXPRESS_NATIO_EXHIBIT_S__3.pdf	1,895	
27	Responsive docs / documents related to debt	031402_2025_AMERICAN_EXPRESS_NATIO_v_AMERICAN_EXPRESS_NATIO_SUMMONS___COMPLAINT_1.pdf	1,139	
28	Responsive docs / documents related to debt	037382_2024_VALLEY_NATIONAL_BANK_v_MILE_ESTATES_LLC_et_al_EXHIBIT_S__3.pdf	673	

No.	Folder	File name (as produced)	Size (KB)	Note
29	Responsive docs / documents related to debt	037382_2024_VALLEY_NATIONAL_BANK_v_MILE_ESTATES_LLC_et_al_SUMMONS___COMPLAINT_1.pdf	200	
30	Responsive docs / documents related to debt	524379_2024_WOC_DEBT_LLC_v_BORUCH_DRILLMAN_et_al_EXHIBIT_S__5 (1).pdf	312	
31	Responsive docs / documents related to debt	524379_2024_WOC_DEBT_LLC_v_BORUCH_DRILLMAN_et_al_EXHIBIT_S__5.pdf	312	Same name and size as No. 30
32	Responsive docs / documents related to debt	524379_2024_WOC_DEBT_LLC_v_BORUCH_DRILLMAN_et_al_EXHIBIT_S__6.pdf	886	
33	Responsive docs / documents related to debt	524379_2024_WOC_DEBT_LLC_v_BORUCH_DRILLMAN_et_al_EXHIBIT_S__7.pdf	151	
34	Responsive docs / documents related to debt	524379_2024_WOC_DEBT_LLC_v_BORUCH_DRILLMAN_et_al_EXHIBIT_S__8.pdf	72	
35	Responsive docs / documents related to debt	524379_2024_WOC_DEBT_LLC_v_BORUCH_DRILLMAN_et_al_JUDGMENT_33.pdf	66	
36	Responsive docs / documents related to debt	59343_2025_NORTHEAST_COMMUNITY_BANK_v_218_FIRE_LLC_et_al_EXHIBIT_S__2.pdf	2,205	
37	Responsive docs / documents related to debt	59343_2025_NORTHEAST_COMMUNITY_BANK_v_218_FIRE_LLC_et_al_EXHIBIT_S__3.pdf	381	
38	Responsive docs / documents related to debt	59343_2025_NORTHEAST_COMMUNITY_BANK_v_218_FIRE_LLC_et_al_EXHIBIT_S__4.pdf	104	
39	Responsive docs / documents related to debt	59343_2025_NORTHEAST_COMMUNITY_BANK_v_218_FIRE_LLC_et_al_EXHIBIT_S__5.pdf	143	
40	Responsive docs / documents related to debt	59343_2025_NORTHEAST_COMMUNITY_BANK_v_218_FIRE_LLC_et_al_SUMMONS___COMPLAINT_1.pdf	242	
41	Responsive docs / documents related to debt	61126_2025_NORTHEAST_COMMUNITY_BANK_v_MOSHE_SILBER_et_al_AFFIDAVIT_OR_AFFIRM_3.pdf	475	
42	Responsive docs / documents related to debt	61126_2025_NORTHEAST_COMMUNITY_BANK_v_MOSHE_SILBER_et_al_EXHIBIT_S__11.pdf	601	
43	Responsive docs / documents related to debt	61126_2025_NORTHEAST_COMMUNITY_BANK_v_MOSHE_SILBER_et_al_EXHIBIT_S__12.pdf	315	
44	Responsive docs / documents related to debt	61126_2025_NORTHEAST_COMMUNITY_BANK_v_MOSHE_SILBER_et_al_EXHIBIT_S__13.pdf	83	
45	Responsive docs / documents related to debt	61126_2025_NORTHEAST_COMMUNITY_BANK_v_MOSHE_SILBER_et_al_EXHIBIT_S__4.pdf	3,052	
46	Responsive docs / documents related to debt	61126_2025_NORTHEAST_COMMUNITY_BANK_v_MOSHE_SILBER_et_al_EXHIBIT_S__5.pdf	5,131	
47	Responsive docs / documents related to debt	61126_2025_NORTHEAST_COMMUNITY_BANK_v_MOSHE_SILBER_et_al_EXHIBIT_S__6.pdf	3,774	
48	Responsive docs / documents related to debt	61126_2025_NORTHEAST_COMMUNITY_BANK_v_MOSHE_SILBER_et_al_EXHIBIT_S__7.pdf	2,095	
49	Responsive docs / documents related to debt	61126_2025_NORTHEAST_COMMUNITY_BANK_v_MOSHE_SILBER_et_al_SUMMONS_1.pdf	133	
50	Responsive docs / documents related to debt	650687_2025_VALLEY_NATIONAL_BANK_v_VALLEY_NATIONAL_BANK_EXHIBIT_S__2.pdf	194	
51	Responsive docs / documents related to debt	650687_2025_VALLEY_NATIONAL_BANK_v_VALLEY_NATIONAL_BANK_SUMMONS___COMPLAINT_1.pdf	256	
52	Responsive docs / documents related to debt	654340_2024_Flagstar_Bank_N_A_v_Moshe_Silber_AFFIDAVIT_3.pdf	255	
53	Responsive docs / documents related to debt	654340_2024_Flagstar_Bank_N_A_v_Moshe_Silber_EXHIBIT_S__4.pdf	390	

No.	Folder	File name (as produced)	Size (KB)	Note
54	Responsive docs / documents related to debt	654340_2024_Flagstar_Bank_N_A_v_Moshe_Silber_EXHIBIT_S__5.pdf	702	
55	Responsive docs / documents related to debt	654340_2024_Flagstar_Bank_N_A_v_Moshe_Silber_JUDGMENT___MONEY_22.pdf	444	
56	Responsive docs / documents related to debt	654340_2024_Flagstar_Bank_N_A_v_Moshe_Silber_SUMMONS_AND_3213_MO_1.pdf	80	
57	Responsive docs / documents related to debt	654386_2024_Acquiom_Agency_Services_LLC_v_Moshe_Silber_ASSIGNMENT_OF_JUDGM_42.pdf	920	
58	Responsive docs / documents related to debt	654386_2024_Acquiom_Agency_Services_LLC_v_Moshe_Silber_JUDGMENT___MONEY_40.pdf	451	
59	Responsive docs / documents related to debt	659618_2024_VALLEY_NATIONAL_BANK_v_VALLEY_NATIONAL_BANK__SUMMONS___COMPLAINT_1.pdf	170	
60	Responsive docs / documents related to debt	659619_2024_VALLEY_NATIONAL_BANK_v_VALLEY_NATIONAL_BANK__SUMMONS___COMPLAINT_1.pdf	168	
61	Responsive docs / documents related to debt	76311_2024_VALLEY_NATIONAL_BANK_v_MAIN_STREET_60_LLC_et_al_EXHIBIT_S__3.pdf	554	
62	Responsive docs / documents related to debt	76311_2024_VALLEY_NATIONAL_BANK_v_MAIN_STREET_60_LLC_et_al_SUMMONS___COMPLAINT_1.pdf	196	
63	Responsive docs / documents related to debt	76312_2024_VALLEY_NATIONAL_BANK_v_VALLEY_NATIONAL_BANK__EXHIBIT_S__2.pdf	13,057	
64	Responsive docs / documents related to debt	76312_2024_VALLEY_NATIONAL_BANK_v_VALLEY_NATIONAL_BANK__EXHIBIT_S__3.pdf	38,094	
65	Responsive docs / documents related to debt	76312_2024_VALLEY_NATIONAL_BANK_v_VALLEY_NATIONAL_BANK__SUMMONS___COMPLAINT_1.pdf	156	
66	Responsive docs / documents related to debt	76318_2024_VALLEY_NATIONAL_BANK_v_VALLEY_NATIONAL_BANK__SUMMONS___COMPLAINT_1.pdf	155	
67	Responsive docs / documents related to debt	850545_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__2.pdf	5,057	
68	Responsive docs / documents related to debt	850545_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__3.pdf	2,452	
69	Responsive docs / documents related to debt	850545_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__5.pdf	65	
70	Responsive docs / documents related to debt	850545_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__6.pdf	477	
71	Responsive docs / documents related to debt	850545_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_NOTICE_OF_ENTRY_148.pdf	6,053	
72	Responsive docs / documents related to debt	850545_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_SUMMONS___COMPLAINT_1.pdf	101	
73	Responsive docs / documents related to debt	850546_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__2.pdf	4,990	
74	Responsive docs / documents related to debt	850546_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__3.pdf	2,143	
75	Responsive docs / documents related to debt	850546_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__6.pdf	472	
76	Responsive docs / documents related to debt	850546_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_NOTICE_OF_ENTRY_138.pdf	5,995	
77	Responsive docs / documents related to debt	850546_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_SUMMONS___COMPLAINT_1.pdf	100	
78	Responsive docs / documents related to debt	850547_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__2.pdf	5,071	

No.	Folder	File name (as produced)	Size (KB)	Note
79	Responsive docs / documents related to debt	850547_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__3.pdf	2,164	
80	Responsive docs / documents related to debt	850547_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__4.pdf	1,810	
81	Responsive docs / documents related to debt	850547_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__5.pdf	65	
82	Responsive docs / documents related to debt	850547_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__6.pdf	478	
83	Responsive docs / documents related to debt	850547_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_JUDGMENT__TO_COURT__79.pdf	202	
84	Responsive docs / documents related to debt	850547_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_NOTICE_OF_ENTRY_84.pdf	6,025	
85	Responsive docs / documents related to debt	850547_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_SUMMONS___COMPLAINT_1.pdf	99	
86	Responsive docs / documents related to debt	850548_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_DECISION___ORDER_ON_85.pdf	2,712	
87	Responsive docs / documents related to debt	850548_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__2.pdf	4,326	
88	Responsive docs / documents related to debt	850548_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__3.pdf	2,060	
89	Responsive docs / documents related to debt	850548_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__4.pdf	1,942	
90	Responsive docs / documents related to debt	850548_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__6.pdf	458	
91	Responsive docs / documents related to debt	850548_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__7.pdf	331	
92	Responsive docs / documents related to debt	850548_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_NOTICE_OF_ENTRY_98.pdf	5,849	
93	Responsive docs / documents related to debt	850548_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_SUMMONS___COMPLAINT_1.pdf	100	
94	Responsive docs / documents related to debt	850549_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_DECISION___ORDER_ON_130.pdf	5,438	
95	Responsive docs / documents related to debt	850549_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__2.pdf	5,053	
96	Responsive docs / documents related to debt	850549_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__3.pdf	2,449	
97	Responsive docs / documents related to debt	850549_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__4.pdf	1,624	
98	Responsive docs / documents related to debt	850549_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__6.pdf	453	
99	Responsive docs / documents related to debt	850549_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_SUMMONS___COMPLAINT_1.pdf	103	
100	Responsive docs / documents related to debt	850550_2023_Deutsche_Bank_Trust_v_RH_2546_7_Ave_LP_et_al_DECISION___ORDER_ON_80 (1).pdf	2,783	
101	Responsive docs / documents related to debt	850550_2023_Deutsche_Bank_Trust_v_RH_2546_7_Ave_LP_et_al_DECISION___ORDER_ON_94.pdf	5,812	
102	Responsive docs / documents related to debt	850550_2023_Deutsche_Bank_Trust_v_RH_2546_7_Ave_LP_et_al_EXHIBIT_S__2.pdf	5,023	
103	Responsive docs / documents related to debt	850550_2023_Deutsche_Bank_Trust_v_RH_2546_7_Ave_LP_et_al_EXHIBIT_S__3.pdf	2,752	

No.	Folder	File name (as produced)	Size (KB)	Note
104	Responsive docs / documents related to debt	850550_2023_Deutsche_Bank_Trust_v_RH_2546_7_Ave_LP_et_al_EXHIBIT_S__4.pdf	2,532	
105	Responsive docs / documents related to debt	850550_2023_Deutsche_Bank_Trust_v_RH_2546_7_Ave_LP_et_al_EXHIBIT_S__6.pdf	473	
106	Responsive docs / documents related to debt	850550_2023_Deutsche_Bank_Trust_v_RH_2546_7_Ave_LP_et_al_EXHIBIT_S__7.pdf	327	
107	Responsive docs / documents related to debt	850550_2023_Deutsche_Bank_Trust_v_RH_2546_7_Ave_LP_et_al_SUMMONS___COMPLAINT_1.pdf	102	
108	Responsive docs / documents related to debt	850551_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_DECISION___ORDER_ON_86.pdf	5,216	
109	Responsive docs / documents related to debt	850551_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__2.pdf	5,069	
110	Responsive docs / documents related to debt	850551_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__3.pdf	2,369	
111	Responsive docs / documents related to debt	850551_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_EXHIBIT_S__6.pdf	457	
112	Responsive docs / documents related to debt	850551_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_NOTICE_OF_ENTRY_88 (1).pdf	5,471	
113	Responsive docs / documents related to debt	850551_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_NOTICE_OF_ENTRY_88.pdf	5,471	Same name and size as No. 112
114	Responsive docs / documents related to debt	850551_2023_Deutsche_Bank_Trust_v_Deutsche_Bank_Trust_SUMMONS___COMPLAINT_1.pdf	103	
115	Responsive docs / documents related to debt	KeyBank National Association v. JE SPE 5399 LLC et al, 1_24-cv-02609, No. 1 (S.D.N.Y. Apr. 5, 2024).pdf	246	
116	Responsive docs / documents related to debt	KeyBank National Association v. JE SPE 5399 LLC et al, 1_24-cv-02609, No. 1-1 (S.D.N.Y. Apr. 5, 2024).pdf	1,916	
117	Responsive docs / documents related to debt	KeyBank National Association v. JE SPE 5399 LLC et al, 1_24-cv-02609, No. 1-11 (S.D.N.Y. Apr. 5, 2024).pdf	416	
118	Responsive docs / documents related to debt	KeyBank National Association v. JE SPE 5399 LLC et al, 1_24-cv-02609, No. 1-5 (S.D.N.Y. Apr. 5, 2024).pdf	312	
119	Responsive docs / documents related to debt	KeyBank National Association v. JE SPE 5399 LLC et al, 1_24-cv-02609, No. 1-6 (S.D.N.Y. Apr. 5, 2024).pdf	111	
120	Responsive docs / documents related to debt	KeyBank National Association v. JE SPE 5399 LLC et al, 1_24-cv-02609, No. 1-7 (S.D.N.Y. Apr. 5, 2024).pdf	290	
121	Responsive docs / documents related to debt	KeyBank National Association v. JE SPE 5399 LLC et al, 1_24-cv-02609, No. 1-8 (S.D.N.Y. Apr. 5, 2024).pdf	102	
122	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 1 (W.D.La. Apr. 4, 2024).pdf	133	
123	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-10 (W.D.La. Dec. 10, 2024).pdf	441	
124	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-11 (W.D.La. Dec. 10, 2024).pdf	400	
125	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-12 (W.D.La. Dec. 10, 2024).pdf	1,019	
126	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-13 (W.D.La. Dec. 10, 2024).pdf	833	
127	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-15 (W.D.La. Dec. 10, 2024).pdf	142	
128	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-2 (W.D.La. Dec. 10, 2024).pdf	94	

No.	Folder	File name (as produced)	Size (KB)	Note
129	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-3 (W.D.La. Dec. 10, 2024).pdf	148	
130	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-4 (W.D.La. Dec. 10, 2024).pdf	547	
131	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-5 (W.D.La. Dec. 10, 2024).pdf	4,514	
132	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-6 (W.D.La. Dec. 10, 2024).pdf	1,395	
133	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-7 (W.D.La. Dec. 10, 2024).pdf	211	
134	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-8 (W.D.La. Dec. 10, 2024).pdf	2,188	
135	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 62-9 (W.D.La. Dec. 10, 2024).pdf	288	
136	Responsive docs / documents related to debt	KeyBank National Association v. Lakewood Pointe Apts LLC et al, 2_24-cv-00850, No. 76 (W.D.La. Jan. 30, 2025).pdf	183	
137	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1 (S.D.N.Y. Apr. 5, 2024).pdf	296	
138	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1-1 (S.D.N.Y. Apr. 5, 2024).pdf	335	
139	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1-11 (S.D.N.Y. Apr. 5, 2024).pdf	430	
140	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1-12 (S.D.N.Y. Apr. 5, 2024).pdf	185	
141	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1-13 (S.D.N.Y. Apr. 5, 2024).pdf	176	
142	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1-2 (S.D.N.Y. Apr. 5, 2024).pdf	188	
143	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1-3 (S.D.N.Y. Apr. 5, 2024).pdf	316	
144	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1-4 (S.D.N.Y. Apr. 5, 2024).pdf	98	
145	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1-5 (S.D.N.Y. Apr. 5, 2024).pdf	1,255	
146	Responsive docs / documents related to debt	KeyBank National Association v. Stallion Aviation LLC et al, 1_24-cv-02610, No. 1-6 (S.D.N.Y. Apr. 5, 2024).pdf	659	

Summary

Folder	Files	Size (MB)
Responsive docs	12	5.0
Responsive docs / documents related to debt	124	231.8
Production Part 2	10	2.0
Total	**146**	**238.7**

EXHIBIT G

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
- X
ACQUIOM AGENCY SERVICES LLC

Plaintiff,

-against-

MOSHE SILBER AKA MARK SILBER

Defendants.
- X

PLAINTIFF'S RESPONSE TO DOCUMENT REQUESTS

Index No. 654386/2024

Non Party Miriam Mizrachi ("Mizrachi") responds to Plaintiff's Subpoena Duces Tecum as follows:

I. General Objections

To avoid undue and unnecessary repetition, Mizrachi makes the following General Objections to each and every demand. All general and continuing objections apply to the response to each request, and specific reference to these objections in the particular response is intended for emphasis only. Failure to list a general and continuing objection is not intended, nor should it be construed as a waiver of that objection.

1. Mizrachi objects to each demand contained in Plaintiff's subpoena to the extent that they seek information that is privileged and immune from disclosure.
2. Mizrachi objects to the demands to the extent that they seek to require Mizrachi to produce documents and/or information which is in the custody and control of, any entity or individual over whom Mizrachi has no control.
3. Mizrachi's search for documents and information is ongoing. Mizrachi reserves their rights to supplement or amend these responses as documents are located.
4. Mizrachi does not waive, nor does it intend to waive these general objections by responding to the following demands.

II. Responses:

1. Subject to and without waiving the General Objections, Mizrachi states that no

responsive documents are in her possession or control.

2. Subject to and without waiving the General Objections, Mizrachi states that a copy of the filed 2021 federal and state tax returns are enclosed herein.

3. Subject to and without waiving the General Objections, Mizrachi states that responsive documents are in her possession or control, other than the documents served in response to Number 2.

4. Subject to and without waiving the General Objections, Mizrachi states that the responsive documents within her control and or possession are enclosed herein.

5. Subject to and without waiving the General Objections, enclosed herein is a copy of organizational chart relating to the Judgment Debtor as of June 2022.

6. Subject to and without waiving the General Objections, Mizrachi states that the documents concerning the debts of which Mizrachi is aware in Mizrachi's possession and or control is enclosed herein..

7. Subject to and without waiving the General Objections, Mizrachi states that no responsive documents are in her possession or control.

8. Subject to and without waiving the General Objections, Mizrachi states that enclosed herein is a copy of the Judgment Debtor's Balance Sheet and Personal Financial Statement as of March 31, 2022.

9. Subject to and without waiving the General Objections, Mizrachi states that there are no responsive documents in her possession and or control other than those previously provided.

10. Subject to and without waiving the General Objections, Mizrachi states that there are no responsive documents in her possession and or control other than those previously

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provided.

11. Subject to and without waiving the General Objections, Mizrachi refers the Plaintiff to the Tax Returns and further identifies Marcum LLP.

12. Subject to and without waiving the General Objections, Mizrachi states that she is not in possession or control of any responsive documents. Upon Information and belief, the Judgment maintained a physical office at 100 Philips parkway Montvale New Jersey 07646.

13. Subject to and without waiving the General Objections, Mizrachi states that she is not in possession or control of any responsive documents.

14. Subject to and without waiving the General Objections, Mizrachi respectfully refers the Plaintiff to the documents responsive to Item 6.

15. Subject to and without waiving the General Objections, Mizrachi states that the closing documents for 41 Powder Horn Road Suffern NY 10901 and 1070 Haverstraw Road, Suffern New York are enclosed herein. Mizrachi further states that there are no responsive documents relevant to the toher properties in her possession and or control.

16. Subject to and without waiving the General Objections, Mizrachi states that the responsive documents are enclosed herein.

17. Subject to and without waiving the General Objections, Mizrachi states that the responsive documents are enclosed herein.

18. Subject to and without waiving the General Objections, Mizrachi states that she is not in possession or control of any responsive documents.

19. Subject to and without waiving the General Objections, Mizrachi states that she is not in possession or control of any responsive documents.

20. Subject to and without waiving the General Objections, Mizrachi states that she is

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not in possession or control of any responsive documents.

21. Subject to and without waiving the General Objections, Mizrachi states that she is not in possession or control of any responsive documents.

22. Subject to and without waiving the General Objections, Mizrachi states that responsive documents are enclosed herein.

23. Subject to and without waiving the General Objections, Mizrachi states that there are no responsive documents in her possession and or control other than those previously provided.

24. Subject to and without waiving the General Objections, Mizrachi states that there are no responsive documents in her possession and or control other than those previously provided.

25. Subject to and without waiving the General Objections, Mizrachi states that there are no responsive documents in her possession and or control other than those previously provided.

26. Subject to and without waiving the General Objections, Mizrachi states that this demand appears to be incomplete.

27. Subject to and without waiving the General Objections, Mizrachi respectfully refers the Plaintiff to the documents responsive to Item 15.

28. Subject to and without waiving the General Objections, Mizrachi states that responsive documents are enclosed herein.

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PLEASE TAKE NOTICE that the Mizrachi reserves their rights to supplement any and/or all of the above responses.

Dated: Pomona, New York
April 28, 2025

By: _____
Miriam Mizrachi

TO: **(VIA Email)**
Bernard D'Orazio
Law Offices of Bernard D'Orazio & Associates P.C.
238 West 139th Street
New York New York 10030

Doc ID: 5fdf82f2f6f95dbaea1111b973b499f53fadf737

EXHIBIT H

The Law Offices of Richard J. Corbi PLLC

104 West 40th Street, 4th Floor

New York, NY 10018

November 21, 2026

Via Electronic Mail

Paul S. Hollander, Esq.
Rosanne A. Singer, Esq.
Okin Hollander LLC
Glenpointe Centre West, 2nd Floor
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Teaneck, NJ 07666
phollander@okinhollander.com
rsinger@okinhollander.com
Counsel to Ms. Miriam Mizrachi

Re: ***In re CBRM Realty Inc., et al.*, Case No. 25-15343 (MBK) (Bankr. D.N.J.) Order Entered October 21, 2026 [Doc. No. 892] — Non-Compliance and Demand for Compliance Within 48 Hours**

Dear Paul:

We have your letter of November 20, 2026, Ms. Mizrachi's Objections and Responses of the same date, and the link to the documents provided to you by Berkovitch & Bouskila, PLLC. We write because, taken together, they do not comply with the Order entered October 21, 2026 [Doc. No. 892] (the "Order"). (The Objections and Responses cite the Order as ECF No. 903; it is Doc. No. 892.)

Paragraph 4 required Ms. Mizrachi, by November 20, 2026, to "comply with the Subpoena in all respects and produce all responsive, non-privileged documents." Because the Trustee furnished a Bates index of her *Acquiom* production on October 28, 2026, at your request, paragraph 4 also required her to "certify in writing whether the documents identified on that index constitute her complete responsive production in that proceeding, including any supplements," and to "identify and produce any responsive materials omitted from it." Paragraph 7 permitted objections "[t]ogether with or prior to compliance," in detailed and specific form, and required any claim of privilege to be asserted on a log "served with the production to which it relates," identifying each withheld document.

Measured against those terms:

1. *There is no paragraph 4 certification.* Your letter states your firm's "understanding" of what prior counsel's link represents. That is not Ms. Mizrachi's

written certification, it does not address the index we furnished, and it does not address the matters our October 28 letter asked the certification to cover.

2. *Nothing has been produced beyond the Acquiom file.* That file is her April 2025 response to Spano's subpoena, with its documents. We have found nothing in it dated after April 28, 2025, although the Subpoena runs to the present. The Order excused her from re-producing those documents and required the certification in their place; she re-produced them and omitted the certification.

3. *All other production is conditioned on an ESI protocol and a Rule 502(d) order.* The Objections and Responses state that no ESI will be identified, collected, searched, reviewed or produced until those are agreed or entered, and they defer every category of the Subpoena on that basis, including real-property records Ms. Mizrachi says she has already identified (Request No. 9) and the tax schedules she says she will produce (Request No. 14). The Order contains no such condition. Paragraph 4 fixed November 20 and provided that only the Trustee or the Court could extend it. Paragraph 13 reminds the parties to meet and confer about an ESI protocol and a Rule 502(d) order; it does not suspend paragraph 4. Neither the Trustee nor the Court has extended the deadline, Ms. Mizrachi did not ask either to, and counsel did not seek to meet and confer prior to November 20.

4. *Objections the Court overruled are re-asserted.* These include the objection to the January 1, 2018 start of the Relevant Time Period (now with a proposed substitute of May 27, 2022 to May 19, 2025); the objections to the definitions; the overbreadth and burden objections to Requests 7, 12, 13, 14 and 22; and a "preserved" claim to cost-shifting without the supported showing paragraph 4 requires. Those objections were made in the Motion to Quash and the Opposition, and paragraph 2 of the Order overruled them. Restating them does not revive them. Nor does an objection suspend the deadline: when the Court intended that, it said so, as in its November 13, 2026 order on the Levon subpoenas, which stays production of "that specific request" on a detailed objection [Doc. No. 907, ¶ 8]. The Order contains no such provision.

5. *There is no privilege log.* The Objections and Responses state that Ms. Mizrachi will withhold communications with Mr. Silber as marital communications and propose a categorical log because a document-by-document log would be burdensome. Paragraph 7 fixed the form of the log: each withheld document, by date, author, recipients, general subject matter and basis.

6. *Request No. 20 is not answered.* It calls for documents concerning any "safe deposit box, storage unit or similar facility." The response addresses only safe deposit boxes, although her own production includes a storage-facility record.

Vecta and Sunnyside. Consistent with paragraph 3 of the Court's November 13, 2026 order on the Levon subpoenas [Doc. No. 907], the Trustee will pursue discovery from Ms. Mizrachi concerning the Sunnyside/Vecta Entities, as that order defines them, in the adversary proceeding it anticipates commencing, without prejudice to its rights under the Subpoena and the Order. The demand below does not extend to that discovery. It extends to everything else the Subpoena calls for.

The only basis remaining on which Ms. Mizrachi may withhold a responsive document is privilege or work-product protection, asserted on a log that meets paragraph 7. She may not otherwise withhold discovery. That is also the position she agreed to in *Acquiom*, where, after a contempt application had been brought on by order to show cause, she stipulated that she would produce all documents in her possession, custody or control and "shall not interpose any defense or objection (except privilege, if applicable)."

Accordingly, the Trustee demands that **by 5:00 p.m. (Eastern Time) on Monday, November 23, 2026**, Ms. Mizrachi:

(a) serve the written certification required by paragraph 4 of the Order, signed by her, addressing the index we furnished and the matters identified in our letter of October 28, 2026;

(b) withdraw the ESI-protocol and Rule 502(d) preconditions and the objections the Order overruled;

(c) produce all responsive, non-privileged documents in her possession, custody or control, other than documents concerning the Sunnyside/Vecta Entities, beginning with the documents she has already located, including documents held on her behalf by her accountants or any other agent (Subpoena Instruction 14); and

(d) serve a log, in the form paragraph 7 of the Order requires, of every document withheld on a claim of privilege or work-product protection.

If she does not, the Trustee will move, on shortened notice, for an order compelling Ms. Mizrachi to comply with the Order, and will seek an award of the fees and costs incurred as a result of the non-compliance against Ms. Mizrachi and against your firm. Attached are draft copies of the motion to compel and motion for shortened notice. The Trustee reserves the right to seek civil contempt sanctions. Paragraph 7 directed counsel to Ms. Mizrachi to assert her objections and claims of privilege in the form the Order prescribes, the conditions on which production is being withheld appear in a paper your firm signed, and paragraph 10 expressly reserves the Trustee's right to seek fees, costs and further relief in the event of non-compliance.

We are available to meet and confer on Tuesday, November 24, 2026, as you propose, at 11:00 a.m. (Eastern Time). The purpose of that call, from the Trustee's side, is how compliance is completed, not whether. It does not extend the deadline above, and the December 7, 2026 conference does not alter the deadline in paragraph 4 or the obligations in paragraph 7.

This is the second time Ms. Mizrachi has answered a subpoena this way. In *Acquiom* she produced nothing for three months, until Spano moved by order to show cause to hold her in contempt; the court stated at the April 3, 2025 hearing that, from its perspective, she was in contempt; and a second contempt application was pending when the action was stayed by Mr. Silber's bankruptcy filing. The Trustee will not wait for a third.

Documents produced under the Order remain subject to the Protective Order entered in these cases [Doc. No. 791], as paragraph 9 of the Order provides. The Trustee reserves all rights and remedies.

Very truly yours,

THE LAW OFFICES OF RICHARD J. CORBI PLLC
Counsel to CBRM Creditor Recovery Trustee

/s/ Richard J. Corbi
Richard J. Corbi

cc: Mr. Daniel Kamensky, Creditor Recovery Trustee